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ABSTRACT

An overview is presented of the accreditation process of the Commission on Institutions of Higher Education, along with a brief history of how that process has evolved. The handbook is divided into the following chapters: (1) introduction (meaning and purposes of accreditation, the evaluation of the Commission's evaluative principles, and the current mission, operations, services and personnel of the Commission); (2) affiliation with the Commission (types of affiliation, general institutional requirements, evaluative criteria, and obligations of affiliation); (3) statement of affiliation status; (4) the evaluation process (including self-study, the evaluation team, evaluation visit, reporting, and the review process); (5) ongoing monitoring called for by the Commission (reports, focused evaluations, and institutional annual reports); (6) institutional change (Commission policies and procedures that an institution must follow to seek approval of changes in its Statement of Affiliation Status); (7) sanctions (including probation, withdrawal of affiliation, reapplication and appeals); and (8) informing the public (how the affiliation of an institution is made known to the public). Seven appendices provide information on the Commission evaluation fee schedule, preliminary information form, rules of procedures, guidelines on contractual relationships, and guidelines of institutional good practice,(confidentiality, disclosure, etc.), and a list of Council on Postsecondary Accreditation (COPA) and the regional accrediting associations is also provided as well as an index of Commission policies and a list of Commission members and staff. (KM)

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A HANDBOOK OF ACCREDITATION

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COMMISSION ON INSTITUTIONS OF HIGHER EDUCATION

1988-89

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North Central Association of Colleges and Schools

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PREFACE

The Commission staff have prepared this 1988-89 edition of *A Handbook of Accreditation* to present an overview of the Commission's accreditation process and a brief history of how that process has evolved. Together with *A Guide to Self-Study for Commission Evaluation* and *A Manual for the Evaluation Visit*, it provides a description of the principles, policies and procedures which currently govern the Commission's work. The *Handbook* is the core of this set of documents, and each of the other publications assumes its reader's familiarity with the information contained here. All three documents are revised and republished on a regular basis. Significant changes in policies and procedures occurring between publications are reported in the Commission's *Briefing* newsletter. Questions about current policies and procedures should be directed to the Commission office.

The *Handbook* is organized as follows:

- The **Introduction** reviews the meaning and purposes of accreditation and the evolution of the Commission's evaluative principles, and includes new sections on the current mission, operations and services, and personnel of the Commission.

- **Chapter II** is a newly organized chapter which defines the types of affiliation with the Commission, and includes the General Institutional Requirements, the Evaluative Criteria for Accreditation and Candidacy, and the Obligations of Affiliation.

- **Chapter III** describes the Statement of Affiliation Status.

- **Chapter IV** provides an overview of the process by which the Commission determines whether an institution meets the criteria. (Note: with this edition much of the detail about the evaluation visit can now be found in the *Manual for the Evaluation Visit*.)

- **Chapter V** is a new chapter which discusses some of the ways the Commission monitors affiliated institutions between comprehensive evaluations.

- **Chapter VI** specifies the Commission policies and procedures that an institution must follow to seek approval of changes in its Statement of Affiliation Status.

- **Chapter VII** explains the Commission's sanctions.

- **Chapter VIII** discusses how information on the affiliation of an institution is shared with the public.

The *Handbook*, *Guide* and *Manual* include an index which tells the reader where information on the Commission's various policy statements can be found in each of the documents.

The Commission staff hope that this *Handbook*, the *Guide* and the *Manual* will answer most of the questions the reader will have about the activities and accreditation processes of the Commission. Please notify us if they do not.

CHAPTER I

INTRODUCTION

The Purposes of Institutional Accreditation

"In no country in the world," wrote Alexis DeTocqueville, "has the principle of association been more successfully used, or applied to a greater multitude of objects, than in America." Voluntary accreditation, as carried out by the various accrediting bodies, is a process uniquely American. Accreditation is voluntarily sought by institutions and is conferred by non-governmental bodies. This non-governmental and voluntary nature of educational accreditation has been shaped by the continuing American emphasis on self-reliance and local control that DeTocqueville observed in the 1830's.

There are two types of educational accreditation: institutional and specialized. Institutional accreditation evaluates an entire institution and accredits it as a whole; specialized accreditation evaluates particular units, schools, or programs within an institution. Institutional accreditation is provided by six regional associations of schools and colleges (each named after the region in which it arose—Middle States, New England, North Central, Northwest, Southern and Western); and by several national associations which limit their scope to particular kinds of institutions.

Institutional accreditation has two fundamental purposes: **to provide public confirmation that what the institution is doing is of acceptable quality and to assist each institution in improving its own activities.** The Commission on Institutions of Higher Education of the North Central Association of Colleges and Schools fulfills these purposes by formulating criteria appropriate to the task, requiring periodic evaluation visits by peers, assisting institutions engaged in self-study, monitoring institutional change, and publishing materials bearing on institutional improvement and evaluation. Through its processes the Commission aims at strengthening its affiliated institutions; through its evaluation and monitoring the Commission seeks to assure the public of the acceptable nature of accredited institutions.

Because it is an institutional accrediting body, the Commission evaluates more than the formal educational activities of an institution; it assesses as well such things as governance and administration, student personnel services, financial stability, and physical facilities. The widely different purposes and scopes of educational

institutions demand that the criteria by which an institutional body makes its judgments be broad enough to encompass, if not encourage, innovation yet clear enough to assure acceptable quality.

Specific programs within an educational institution can also seek accreditation, called specialized (or program) accreditation. Such accreditation is often closely associated with professional associations. Examples are: the National League for Nursing, the National Council for Accreditation of Teacher Education, and the National Association of Schools of Music. There are over forty such specialized bodies recognized by the national Council on Postsecondary Accreditation. Institutional accreditation is separate from the accreditation given or withheld by professional associations, although the Commission does take cognizance of the standards set by professional bodies.

The North Central Association

On March 29 and 30, 1895, thirty-six school, college, and university administrators from seven midwestern states met at Northwestern University in response to an invitation signed by the presidents of the University of Chicago, the University of Michigan, Northwestern University, and the University of Wisconsin, and by the principals of Grand Rapids High School, Michigan Military Academy, and the Michigan Normal School. They had been called to "organize, if deemed expedient, an association of colleges and schools of the North-Central States." The constitution of the association these educators formed stated that the North Central Association's object would be "the establishment of close relations between the colleges and secondary schools" of the region.

Within a short time, the desire to improve articulation between secondary schools and colleges led to extensive examination of the quality of education at both levels; and that led to the accreditation of secondary schools and, later, colleges and universities.

Two histories of the Association—Calvin O. Davis' *A History of the North Central Association* (1945) and Louis G. Geiger's *Voluntary Accreditation: A History of the North Central Association 1945-1970* (1970)—trace this evolution and chronicle the decisions and actions the Association has taken to provide educational leadership to the region and the country.

Today, the Association serves colleges and schools in nineteen states—Arizona, Arkansas, Colorado, Illinois, Indiana, Iowa, Kansas, Michigan, Minnesota, Missouri, Nebraska, New Mexico, North Dakota, Ohio, Oklahoma, South Dakota, West Virginia,

Wisconsin, and Wyoming—and the American Dependents' Schools operated overseas for the children of American military and civilian personnel. Its day-to-day operations are conducted by its two Commissions: the **Commission on Schools,** located in Boulder, Colorado, which accredits institutions below the postsecondary level; and the **Commission on Institutions of Higher Education,** in Chicago, Illinois, which accredits postsecondary institutions.

A Brief History of the Commission

Since it began accrediting postsecondary educational institutions in 1913, what is now known as the Commission on Institutions of Higher Education of the North Central Association of Colleges and Schools has tried both to reflect and to encourage progress in higher education. At first, postsecondary institutions were measured against a set of standards. Some were quite explicit ("the college, if a corporate institution, shall possess a productive endowment of not less than $200,000"; "the college should limit the number of students in a recitation or laboratory class to thirty"); others were broader ("the college should be provided with adequate books in the library and laboratory equipment to develop and fully illustrate each course taught"). During the first decades of the century, such quantitative and prescriptive standards helped to bring some order to higher education.

But as early as 1921 President Judson of the University of Chicago warned against the danger of excessive rigidity in the standards; and by the end of the twenties, critics charged that the standards had become roadblocks to legitimate experimentation and constructive change. The North Central Association's college commission responded to these concerns by undertaking an exhaustive study of its accreditation process.

This reconsideration ended in a fundamental shift in the emphasis of the accreditation process which led the Commission to the principles which still guide it today. The concept of standardization was abandoned. Henceforth, the Association declared in 1934, an institution would be judged "on the basis of the total pattern it presents ... It is accepted as a principle of procedure that superiority in some characteristic may be regarded as compensating, to some extent, for deficiencies in other respects ... an institution will be judged in terms of the purposes it seeks to serve." Under this new approach, strengths were to be weighed against weaknesses to evaluate the "total pattern" of the institution. Before, it was assumed that all institutions had the same fundamental purposes; now, the increasing diversity of institutions was to be recognized. Each institution was to be judged in the light of its own

self-declared purposes—as long as these were appropriate to a postsecondary educational institution. "Standards" were replaced by "criteria"; "inspectors" became "examiners"; and the basis for accreditation decisions became a comparison of data concerning an institution against a set of "norms" derived from data accumulated from many institutions. The "pattern" of data from the institution being evaluated was compared to a "pattern map" based on these norms, and the institution was accredited if the two patterns seemed to match.

The normative technique was used until after World War II. It became apparent that the notion of standardization—the pressure to conform—was inherent in the very idea of norms. The idea of a norm assumes similarity; institutions cannot be measured against a norm unless they are basically alike. But the 1934 principle accepted the fact that they were not alike. Moreover, using normative data to make evaluation decisions also conflicted with the principle that an institution was to be judged in terms of its own purposes. Further, in 1957 the Commission began a program of periodically reaffirming the accreditation of member institutions. As a consequence, a new emphasis was placed on institutional renewal and development.

In response to these developments, the Commission produced its *Guide for the Evaluation of Institutions of Higher Education* (1958). The *Guide* moved beyond the ideas of norms and the pattern map to direct the attention of both institutions and Commission examiners to seven basic questions which were considered indicative of the areas that needed to be assessed in order to determine the quality of an educational institution (e.g., "What is the educational task of the institution?" "Are the necessary resources available for carrying out the task ... ?"; "Is student life on campus relevant to the institution's task?"). The focus of evaluation became more qualitative, less quantitative, and, as a result, the professional judgment of the Commission's examiners became proportionately more important in the evaluation decision. The *Guide* was in use in various editions until the early seventies, and the areas it addressed are still present in the Commission's current Evaluative Criteria.

In the sixties and seventies, the Commission's membership increased both in size and variety. Community colleges, vocational-technical institutes, and specialized institutions assumed an increasing importance in American education, and the configurations of resources and organization appropriate to them were not always comparable to those traditionally found in four-year colleges and universities. The Commission joined the other

regional postsecondary accrediting commissions in responding to these changes by adopting a set of "conditions for eligibility" in the early seventies; in effect, these conditions limited and described the kinds of postsecondary institutions the regional associations would accredit. Since the mid-seventies, when its *Handbook on Accreditation* first appeared, the Commission has increasingly emphasized the self-study process as both a procedure for gathering data for accreditation decisions and a means to institutional improvement.

In 1981, the Commission adopted the Criteria for Accreditation and Criteria for Candidacy for Accreditation which incorporate and supersede all previous statements and serve as the basis for the accreditation process as it is currently conducted by the Commission. In 1987 the Commission reformulated its General Institutional Requirements which define the essential characteristics of all its affiliated institutions. (See Chapter II.) The evolution of the Commission's policies and procedures over the past seventy years or so has been constant, and there is no reason to believe that this will not be so in the next seventy.

The Mission of the Commission

The mission of the Commission, as adopted on January 21, 1980, reads as follows:

> The Commission on Institutions of Higher Education, a component of the North Central Association of Colleges and Schools, is an organization of those member institutions of the Association accredited by the Commission. These institutions are joined together for two fundamental purposes:
>
> 1. **to establish and apply criteria for the accreditation of postsecondary educational institutions;**
>
> 2. **to assist affiliated institutions in the improvement of their educational programs and related activities.**
>
> In addition to the member institutions, institutions judged by the Commission capable of achieving accreditation in a reasonable time may be affiliated with the Commission in non-membership categories.
>
> The Commission limits its scope of activities to postsecondary institutions located in the North Central region and having certain organizational, operational, and educational characteristics as set forth for various types of institutions by the Commission.
>
> The primary means utilized to achieve the purposes of the Commission is the accreditation process. Beginning with the institutional self-study and self-evaluation as a device both for

institutional improvement and for assembling the information needed for external evaluation, the accreditation process subjects an institution to an external evaluation by persons from peer institutions. At the successful conclusion of the evaluation the Commission accepts the institution as a member of the Association and certifies that the institution meets the Criteria for Accreditation set forth by the Commission.

In addition to conducting the accreditation process, the Commission in furtherance of its fundamental purposes

1. regularly monitors institutions affiliated with it, both to ascertain that they continue to achieve their avowed purposes and to become aware of ways in which the Commission can assist them in improving their effectiveness;

2. maintains a continuing relationship with other groups concerned with accreditation and educational improvement, especially the schools;

3. subjects its criteria and procedures for accreditation to continuing study to be sure they represent the best theory and practice of institutional accreditation and are responsive to the educational need of society;

4. provides reasonable and appropriate public information about the institutions affiliated with the Commission;

5. provides assistance to affiliated but unaccredited institutions to assist them in fulfilling the requirements of accreditation;

6. studies, and assists others to study, current issues in postsecondary education bearing on the maintenance and improvement of educational institutions;

7. prepares and disseminates publications, provides counsel, and conducts meetings directed at the improvement of postsecondary education;

8. promotes the self-regulation of institutions by requiring or recommending good practices for the conduct of institutional activities.

The Commission Offices and Services

A full-time staff in the Commission's Chicago office responds to inquiries and provides assistance to institutions, evaluation teams, other agencies, and the public.

The Commission and its staff provide a number of services for institutions. Each institution affiliated with the Commission is assigned to a member of the Commission's professional staff. This staff member serves as the institution's resource person and liaison

with the Commission office, during the self-study, the evaluation processes, and between evaluations. Institutional representatives are invited to visit the Commission's office in Chicago and meet with their individual staff liaison; professional staff members visit institutions on request. The Commission also maintains a WATS line as a service. Institutions preparing for an evaluation of any kind are encouraged to keep in contact with the staff member. Although not all institutional changes require Commission action, it is important that contact be made with staff whenever a change such as adding degrees, locations, or programs, is under consideration. (See Chapter VI.)

Through its publications, the Commission seeks to provide information about its work. *A Handbook of Accreditation*, *A Guide to Self-Study for Commission Evaluation*, and *A Manual for the Evaluation Visit* are the principal publications of the Commission and should be consulted for essential information about the Commission's policies and procedures. The *Briefing* newsletter, published three or four times each year, is especially helpful for information on current developments. The NCA *Quarterly* is another useful resource, with each of the Association's two Commissions responsible for two issues a year—one issue providing that Commission's formal list of affiliated institutions, the other serving as a journal of articles relevant to that Commission's work.

The Commission also conducts an extensive program on self-study, evaluation, and institutional improvement for institutional representatives and Consultant-Evaluators as a part of the Annual Meeting of the North Central Association held in early spring in Chicago. One outcome of this program is the annual publication, *A Collection of Papers on Self-Study and Institutional Improvement*, which provides useful information from the perspective of experienced evaluators, persons who have recently been involved in self-study, and others involved in higher education.

The Commission receives a wide variety of communications from the general public. The office responds directly to such matters as relate to affiliation; many inquiries are referred to other appropriate associations and agencies. The Commission's brochure, *Accreditation of Postsecondary Institutions: An Overview*, is particularly helpful in explaining the work of the Commission to the general public.

The Consultant-Evaluator Corps

The Commission's decision to base its evaluation of institutions of higher education on qualitative criteria rather than quantitative standards made its Consultant-Evaluator Corps a critical component of the accreditation process. At every step in that process

these educators from throughout the North Central region offer their time and expertise to render the judgments and establish the policies which embody the Commission's purposes of public certification and institutional improvement.

- As **evaluation team members** they examine institutional effectiveness, provide advice and counsel for institutional improvement, and recommend accrediting actions;
- as **Commissioners-at-Large** they participate in the review processes of the Commission, the next step in the evaluation process following the team visit;
- as **Executive Commissioners** they have responsibility for decisions on the accreditation of institutions, for the formulation of Commission policies, and for the oversight of Commission operations.

Drawn from large institutions and small, from long-established ones and new; from private institutions and public, church-related and secular; from vocational-technical institutes, community and junior colleges, four-year colleges, professional schools and universities; from towns of five hundred and cities of several million, they are as diverse as American higher education itself. Such diversity makes genuine peer review of institutions of higher education within the North Central region a reality rather than a catchphrase. Yet for all their differences, the members of the Consultant-Evaluator Corps are similar in their willingness to give generously of their time and expertise, their dedication to educational excellence, and their commitment to the principles underlying voluntary accreditation. The corps currently numbers about seven hundred members. Each year approximately fifty educators from member institutions are invited to join them in their work.

Relations with Governmental Agencies

To determine eligibility for United States government assistance under certain legislation, the U.S. Department of Education consults the lists of postsecondary institutions affiliated with nationally recognized accrediting agencies that the government views as reliable authorities on the quality of educational institutions and programs. Since the Commission on Institutions of Higher Education, a member of the Council on Postsecondary Accreditation, is among these governmentally-recognized authorities, affiliation with the Commission helps an institution become eligible for various federal funds. The most recent review of the Commission by the USDE was conducted in 1987.

The Commission also maintains communications and discussions with officers of states, coordinating, and higher boards to clarify

the functions and concerns of the Commission with respect to its affiliated institutions affected by these types of boards.

Council on Postsecondary Accreditation

The Council on Postsecondary Accreditation (COPA) is a national nongovernmental organization that works to facilitate the role of accrediting bodies in promoting and insuring the quality and diversity of American postsecondary education. The accrediting bodies, while established and supported by their memberships, are intended to serve the broader interests of society as well. To promote these ends, COPA periodically reviews the activities of the accrediting bodies it recognizes, and provides other services directed at the improvement of accreditation.

The Commission has been recognized by COPA since COPA's founding in 1975. The most recent review of the Commission by COPA was conducted in 1985.

CHAPTER II

AFFILIATION WITH THE COMMISSION

Forms of Affiliation

Postsecondary educational institutions may be affiliated with the Commission on Institutions of Higher Education, and through it with the Association, in either of two ways. One is as an **accredited** institution; the other is as a **candidate** institution. Both affiliations are voluntary and are initiated by an institution. (See Chapter IV and Appendix B.)

Candidacy is a preaccreditation status and, unlike accredited status, does not carry with it membership in the Commission and the Association. Candidacy indicates that an institution meets the Commission's General Institutional Requirements (GIRs) and Evaluative Criteria for Candidacy and is progressing toward accreditation; it does not automatically assure eventual accreditation. Candidacy provides an institution with the opportunity to establish a formal, publicly-recognized relationship with the Association, and is the recommended approach to seeking accreditation for most non-affiliated institutions.

An institution achieves candidacy status after the Commission has determined through the process outlined in Chapter IV that it meets the GIRs and the Evaluative Criteria for Candidacy. An institution being evaluated for candidacy must have students actively pursuing its programs at the time of the team visit. An institution continues its candidacy for a fixed period of time—usually no longer than six years—until it either fulfills the Evaluative Criteria for Accreditation or has its affiliation with the Commission terminated. An institution holding candidacy may request that it be evaluated for accreditation—rather than continued candidacy—whenever it believes that it can demonstrate that it meets the Evaluative Criteria for Accreditation. Such a decision should be made after consultation with Commission staff.

Accreditation indicates both to other institutions and to the public that an institution meets the Commission's GIRs and Evaluative Criteria for Accreditation. It also indicates the institution's commitment to the purposes and goals of the Association.

An institution becomes accredited, and thus a member, after the Commission has determined through the evaluation process outlined in Chapter IV that it meets the GIRs and the Evaluative Criteria for Accreditation. An institution being evaluated for

accreditation must have students actively pursuing its programs at the time of the team visit and it also must have graduated at least one class of students prior to Commission action. If the institution has graduated its first class not more than one year before the Commission's evaluation, the effective date of accreditation will be the date of graduation of that first class. An institution continues its membership and accreditation as long as it continues to meet the Evaluative Criteria for Accreditation and the other obligations of membership.

Since candidacy is not a prerequisite to accreditation, an institution applying for initial affiliation with the Commission may choose to seek either status. The staff member assigned to work with the institution will explain the options available as the institution begins its self-study. New or developing institutions will usually choose to seek candidacy; older, more established institutions sometimes choose to seek accreditation. The choice of which form of affiliation to pursue will be based on the institution's assessment of whether it meets the Evaluative Criteria for Candidacy or the Evaluative Criteria for Accreditation.

Affiliation with the Association and the Commission is voluntary, and an institution may resign its affiliation at any time. Resignation from affiliation terminates the institution's accreditation or candidacy; it must be initiated by action of the legally designated governing body of the institution. Resignation does not release the institution from past and current financial obligations with the Commission. There is no special procedure to reinstate an institution whose affiliation has been terminated, and an institution wishing to reaffiliate must follow the same procedure as an institution never affiliated with the Commission.

General Institutional Requirements

Every postsecondary educational institution affiliated with the Commission must demonstrate that it satisfies each of the following **General Institutional Requirements.** Taken together, they define the kind of institution that the Commission considers a part of its educational universe.

The General Institutional Requirements

An institution affiliated with the Commission by either accreditation or candidacy has to meet the following Requirements:

Mission and authorization

1.a. The institution has formally adopted and made public its statement of mission.

The term "statement of mission" refers to a general statement of the goals the institution wishes to pursue, such as might be found in the statutes establishing a public institution or in the incorporation statement of an independent institution. More precise goals ("purposes") against which the institution can measure its accomplishments are the subject of Evaluative Criterion One.

1.b. The statement of mission is appropriate to an institution of higher education.

1.c. The institution confers certificates, diplomas or degrees.

1.d. The institution has legal authority to confer its certificates, diplomas and degrees.

1.e. The institution meets all legal requirements to operate wherever it conducts activities.

This Requirement is of particular importance to institutions offering work in several locations. It is the institution's responsibility to document that it has necessary authorizations.

2.a. The educational programs are compatible with the institution's mission.

2.b. The principal educational programs are based on recognized fields of study at the postsecondary level.

The Commission permits—and expects—reasonable experimentation in developing and defining new fields of study, but its scope is limited to institutions doing this in the context of fields already recognized in higher education. Judging the recognition of a field of study is made by considering a number of indicators. For example, whether the field is taught in several different institutions; whether there is a literature distributed to others through journals and monographs and widely available in libraries; whether the field has given rise to a licensed profession or vocation; and whether there are professional organizations among persons in the field. An institution offering work only in fields not yet fully formed and recognized lies outside the Commission's ability to evaluate and certify.

2.c. At least one of the undergraduate programs is two or more academic years in length (or the equivalent). If no undergraduate programs are offered, at least one of the

graduate programs is one or more academic years in length (or the equivalent).

While the Commission regards offering short courses as appropriate, its scope is limited to institutions that do this in a context established by the presence of more extended programs. "Academic year" denotes the amount of instructional and study time required, using the typical academic year as the standard.

2.d. General education at the postsecondary level is an essential element of undergraduate degree programs and a prerequisite to graduate degree programs.

The Commission's understanding of the term "general education" was given in its 1983 Statement on General Education:

> General education is "general" in several clearly identifiable ways: it is not directly related to a student's formal technical, vocational or professional preparation; it is a part of every student's course of study, regardless of his or her area of emphasis; and it is intended to impart common knowledge, intellectual concepts, and attitudes that every educated person should possess.

Since general education is regarded as primarily an undergraduate component, the Commission has explicitly provided that graduate programs appropriately speak through their admissions requirements to the need for general education.

2.e. General education and/or a program of related instruction at the postsecondary level is an essential element of undergraduate certificate and diploma programs two or more academic years in length.

Undergraduate certificate and diploma programs that extend as long as degree programs should provide for more than immediate vocational interests. Because of the strong vocational component in such programs, general education, or related instruction, or a combination of general education and related instruction may be used to provide this broadening. "Related instruction" is drawn from the usage in vocational-technical education: instruction broadening a curriculum beyond purely vocational purposes, but closely associated with those purposes, and often incorporated into vocational courses. Such instruction commonly provides for the development of knowl-

edge and skills in language, mathematics and human relations.

2.f. The certificate, diploma or degree awarded upon successful completion of an educational program is appropriate to the demonstrated attainment of the graduate.

The integrity of each institution's credentials is a necessary condition to sustaining public confidence in higher education. While specific degree requirements vary among institutions, there are general understandings of the meanings of the several degrees, and institutions are expected to follow these understandings in naming degrees.

Institutional organization

3.a. There is a governing board, legally responsible for the institution, which establishes and regularly reviews basic policies that govern the institution and protect its integrity.

The hallmark of the governing board is that it bears the legal responsibility for the institution. This Requirement mandates both Board review and Board establishment of basic policies. By "integrity" the Commission means coherence between word and deed. The integrity of institutional policies dealing with athletic programs is of particular public concern at the present time.

3.b. The governing board includes individuals who represent the public interest. (Note: In rare situations the Commission may approve alternative means by which the interests of the public are appropriately represented when unusual circumstances prohibit public representatives on the board.)

The activities of educational institutions have long term effects on society. Consequently, the Commission requires that there be opportunity for appropriate expression of the public interest in the policy and decision making activities of the institution. That opportunity is most reasonably assured if there are governing board members whose connections to the institution do not raise the possibility that institutional decisions and actions will affect them personally, and who recognize an obligation to represent the public interest in their governing board service. The governing board may have some members who are employees of the institution and others who have strong personal interests in the institution; the Requirement makes clear that the board

must also have members without such connections to the institution.

3.c. An executive officer is designated by the governing board to administer the institution.

The Executive Officer is the Commission's usual point of contact with the institution.

3.d. A faculty comprising persons qualified by education and experience is significantly involved in the development and review of the educational programs.

"Faculty" refers to a body, not to individuals, and this clearly identified group of qualified persons must participate in the oversight of the educational programs. The composition of the faculty is the institution's responsibility; in most institutions teachers compose the largest component of the faculty. The requirement specifies "significant involvement," which need not include final approval authority. Both the development of new educational programs and the review of existing educational programs fall within the work of the faculty.

3.e. Admissions policies are consistent with the institution's mission and appropriate to the educational programs.

3.f. Admissions practices conform to the admissions policies.

Financial resources

4.a. The institution has financial resources sufficient to support its activities.

Evaluative Criterion Two deals comprehensively with resources, including financial resources. This Requirement emphasizes the necessity of adequate financial resources available to support the activities of the institution.

4.b. The institution has its financial statements externally audited on a regular schedule by a certified public accountant or state audit agency.

Public disclosure

5.a. The institution publishes in its catalog or other appropriate places accurate information that fairly describes

i. its educational programs,
ii. its policies and procedures directly affecting students,

iii. its charges and its refund policies,
iv. the academic credentials of its faculty members and administrators.

5.b. The institution makes available upon request accurate information that fairly describes its financial resources.

The Commission does not specify the content or format of institutional catalogs, brochures or other documents, but requires that they provide full and fair disclosure of the institution's resources, policies, procedures, rules and activities.

The Evaluative Criteria for Accreditation

To be accredited by the Commission on Institutions of Higher Education, an institution must demonstrate that it fulfills the General Institutional Requirements and the following **Evaluative Criteria for Accreditation.**

These Criteria outline a plan for evaluation of an institution in relation to its own purposes—an approach that has been the foundation of the Commission's accreditation process since 1934. They are also a basis for decision-making, requiring the exercise of professional judgment. The procedures of the Commission have been deliberately developed to insure that the final decision is based on the combined judgments of many experienced persons who have access to full and complete information about the institution. In other words, while the Evaluative Criteria are intentionally general, the judgments concerning them are founded on careful and detailed examination of the specifics of the institu-

tion. Their generality insures that accreditation decisions focus on the particulars of each institution's own purposes, rather than on trying to make each institution fit into a preestablished mold.

The following is a brief commentary on the Evaluative Criteria for Accreditation. An extended discussion appears in Chapter III of the *Guide*.

1. **The institution has clear and publicly stated purposes, consistent with its mission and appropriate to a postsecondary educational institution.**

   Each of the other Evaluative Criteria is related to this fundamental one which embodies the Commission's philosophy of judging an institution on the basis of its own purposes. As they are used here, "purposes" and "consistent" refer to the multiple and specific ends the institution wishes to achieve in order to carry out its more general "mission." Most institutions have broad, general statements of mission that are relatively brief. Statements of purposes—of long- and short-range institutional goals, of programmatic objectives—are more specific and detailed. For example, an institution's mission might be, in part, "to meet the educational needs" of its community; a related purpose might be "to provide vocational and technical training through continuing education to adults."

   Determining whether these purposes are "clear and publicly stated" involves judgment of more than where and how they are published and found; it also involves determining whether there seems to be a common understanding of the purposes of the institution among its various constituents and members.

   General Institutional Requirement 1.b. specifies that affiliated institutions have a statement of mission appropriate to an institution of higher education. In choosing the words "higher education," the Commission attempts to differentiate between those institutions whose missions are to supplement secondary education and training (such institutions typically seek accreditation from the Commission on Schools) and those institutions whose missions are to provide postsecondary programs of rigor and discipline sufficient to warrant the name "higher education." Institutions of higher education, however, share some goals and purposes with all postsecondary institutions. Therefore, this evaluative criterion uses the term "postsecondary educational institution" to incorporate the full scope of the institution's goals and purposes.

2. **The institution has effectively organized adequate human, financial and physical resources into educational and other programs to accomplish its purposes.**

   This criterion focuses on whether an institution has the necessary resources appropriately organized into its educational and other programs *so that it can be expected to accomplish its purposes.* Judging that an institution meets this criterion requires detailed information—about governing boards, administrators, faculty, staff, students and the community; about the educational program; about the institution's financial condition; about its facilities—and careful study of how the institution's resources are deployed and administered to make accomplishment of its purposes feasible.

3. **The institution is accomplishing its purposes.**

   This criterion focuses attention on the purposes of the institution as a whole and asks for a judgment of what is actually being accomplished at an institution. Assessing institutional effectiveness and educational outcomes is crucial to a determination that this criterion is met. *This criterion does not prescribe any single methodology* to accomplish this task; a variety may apply. But it does prescribe that an accredited institution has developed measures to provide evidence that the institution is, in fact, accomplishing its purposes.

4. **The institution can continue to accomplish its purposes.**

   If accreditation is to serve both educators and the public, it is necessary to make predictions about the strength and stability of educational institutions. While accreditation cannot guarantee that an institution will always remain strong, it represents the best judgment at the time of the evaluation about the institution's prospects for the future.

   Judgments about an institution's future must be based, in part, on the success of its past and present. How well it has developed its resources to their present condition, how stable its faculty and administration have been, how strong it is at the moment are all indicators of the future. But the Commission also seeks information about the institution's plans and outstanding commitments: about whether it has realistically assessed the conditions that will impinge upon it in the future, whether it has the financial and other resources necessary to respond to unforeseen circumstances, whether it has leadership wise and farsighted enough to anticipate future opportunities and difficulties and respond to them in constructive and creative

ways. The Commission also considers how effectively the institution used the self-study process to enhance its plans for improvement.

The Evaluative Criteria for Candidacy

To be granted candidacy by the Commission on Institutions of Higher Education, an institution must demonstrate that it fulfills the General Institutional Requirements and the following **Evaluative Criteria for Candidacy for Accreditation.**

The Evaluative Criteria for Candidacy are closely related to the Evaluative Criteria for Accreditation since they are meant to provide candidate institutions with a foundation for logical development toward accreditation. The Evaluative Criteria for Candidacy differ from those for accreditation, reflecting the fact that a candidate institution has not yet developed to the point where it meets the Evaluative Criteria for Accreditation and is, therefore, accreditable.

The following is a brief commentary on the Evaluative Criteria for Candidacy.

1. **The institution has clear and publicly stated purposes, consistent with its mission and appropriate to a postsecondary educational institution.**

This criterion is identical to the first Evaluative Criterion for Accreditation, since every institution affiliated with the Commission must have at least such purposes. (See Evaluative Criterion One for Accreditation, p. 20.)

2. **The institution has effectively organized adequate human, financial and physical resources into educational and other programs so that it is accomplishing its immediate purposes.**

   This criterion differs from the second Evaluative Criterion for Accreditation in that it speaks of a candidate's accomplishing its *immediate* purposes. The difference is meant to acknowledge that a candidate is not yet fully developed to the point at which it has the ability to accomplish *all* of its purposes. However, the wording of this criterion—unlike that of the second Evaluative Criterion for Accreditation—requires that the candidate not only have organized the resources to accomplish these immediate purposes, but that it *be* accomplishing them. The criterion limits attention to immediate purposes, but requires actual accomplishment. (In effect, the second Evaluative Criterion for Candidacy combines the second and third Evaluative Criteria for Accreditation as they apply to the candidate's immediate purposes.)

   Judging that an institution fulfills this criterion requires detailed information—about governing boards, administrators, faculty, staff, students, and the community; about the educational program; about the institution's financial condition; about its facilities—and careful study of how the candidate's resources are deployed and administered to accomplish its immediate purposes.

3. **The institution is following realistic plans to acquire and organize any additional resources needed to accomplish all of its stated purposes.**

   This criterion directs attention to the institution's plans for development over the candidacy period. It requires that the candidate demonstrate that is has conducted a self-study of its strengths and areas of concern and has done the necessary planning–for students, faculty, staff, curriculum, financial, physical, and other development–so that it can realistically be expected to accomplish all of its stated purposes within that period.

4. **The institution has the potential to achieve accreditation within the candidacy period.**

In making this judgment, the candidate's present condition, its plans and its timetable for developing to the point where it meets the Evaluative Criteria for Accreditation must be examined. Candidacy is of limited duration, and the Commission seeks to determine through this criterion that the candidate's current plans are likely to allow it to achieve accreditation within this limited period.

Obligations of Affiliation

All institutions affiliated with the Commission voluntarily agree to meet institutional obligations of affiliation, including periodic review, payment of dues and fees, and making reports as requested by the Commission. Failure to do so could result in loss of affiliation.

The Periodic Review Cycle

Every institution must have its accreditation reaffirmed not later than five years after it has been initially granted, and not later than ten years following each subsequent reaffirmation. The time for the next comprehensive evaluation for continued accreditation is explicitly stated in the Commission's accreditation action; however, the time of the next evaluation may be changed and may occur sooner if the institution introduces or plans changes which substantially alter its mission, functions or character (see Chapter VI).

An institution denied accreditation upon initial application must wait two years before reapplying. This period of time may be shortened by action of the Commission.

Candidacy is continued by evaluations scheduled at least every two years during the candidacy period. These **biennial visits** are conducted to determine that the institution continues to meet the Evaluative Criteria for Candidacy for Accreditation and also to assist the institution as it moves toward fulfilling the Evaluative Criteria for Accreditation.

The maximum length of candidacy is six years. Extensions of candidacy beyond the sixth year are granted only rarely and require special Commission action.

An institution denied candidacy upon initial application must wait one year before reapplying. This period of time may be shortened by the Commission.

CHAPTER III

THE STATEMENT OF AFFILIATION STATUS

A Description of the Statement

The Statement of Affiliation Status (SAS) is the basic document setting forth the status of the institution with the Commission. Any accrediting action of the Commission is taken by adopting an SAS for the institution. An institution is free to make changes in its activities unless such changes affect the contents of the institution's SAS. If institutional changes will affect the SAS, the Commission's *Policy on Changes Affecting the Affiliation Status of an Institution* applies, and Commission approval is required before the changes are effected (see Chapter VI).

Each statement contains nine basic elements:

- **Name:** name and address of the institution.
- **Control:** a description of the institution's public or private, not-for-profit or proprietary character (in the case of proprietary institutions, this section also identifies the proprietors)
- **Status:** a description of the institution's candidate or accredited status with the Commission and the year the status was granted.
- **Educational Programs:** the Commission's description of the institution's degree program types (see pp. 23-24).
- **Locations:** the Commission's description of the locations at which the institution operates (see pp. 24-25).
- **Stipulations:** the Commission's description of any limitations or stipulations attached to its status.
- **Reports Required:** information about any reports the institution is required to file with the office of the Commission.
- **Focused Evaluations:** information about any focused evaluations scheduled before the next comprehensive evaluation.
- **Comprehensive Evaluation:** the date of the institution's most recent comprehensive evaluation and the scheduled date of its next comprehensive evaluation.

Each time a change in the information pertaining to one or more of these elements occurs, the SAS is reviewed and revised through appropriate Commission processes and a revised SAS is sent to the institution by the office of the Commission. Thus, at any given time, the most recent SAS contains all of the current information concerning the status of the institution's affiliation with the Commission.

The SAS is, from time to time, shared with the public. People within and without an institution may assume that the SAS provides specific and complete information about the institution. Because the SAS is tied directly to the Commission's procedures for monitoring institutional change, it may be very general or very specific depending on the kind of monitoring the Commission believes to be necessary. Types of degree programs and locations of an institution's operation typically present the greatest diversity of information listed.

Categorization of Degrees

When it grants candidacy or accreditation to an institution, the Commission specifies the types of certificates and/or degree programs that institution awards. The Educational Programs section of each institution's Statement of Affiliation Status states the basic types of certificates and/or degree programs the institution's status with the Commission covers.

The Commission uses the following certificate and degree designations:

C Certificates and diplomas carrying no degree titles recorded on the SAS as "Certificates" and "Diplomas" can apply to undergraduate and graduate certificates and diplomas

A/a Associate's degrees signifying arts and sciences curricula (generally A.A. and A.S.) recorded on the SAS as "Associate's (arts and sciences curricula)"

A/v Associate's degrees signifying vocational-technical curricula (generally all degrees other than A.A. and A.S.) recorded on the SAS as "Associate's (vocational-technical curricula)"

B/a Bachelor's degrees signifying arts and sciences curricula (generally B.A. and B.S.) recorded on the SAS as "Bachelor's (arts and sciences curricula)"

B/p Bachelor's degrees signifying professional curricula (generally all degrees other than B.A. and B.S.) recorded on the SAS as "Bachelor's (professional curricula)"

M/a Master's degrees signifying arts and sciences curricula (generally M.A. and M.S.) recorded on the SAS as "Master's (arts and sciences curricula)"

M/p Master's degrees signifying professional curricula (generally all degrees other than M.A. or M.S.) recorded on the SAS as "Master's (professional curricula)"

S Specialist certificates or degrees beyond the Master's (generally the Education Specialist) recorded on the SAS as "Specialist"

D/r Doctor's degrees signifying research curricula (generally the Ph.D. and Ed.D. or equivalent) recorded on the SAS as "Doctor's (research curricula)"

D/p Doctor's degrees signifying professional curricula (generally professional doctorates: M.D., J.D., D. Min., etc.) recorded on the SAS as "Doctor's (professional curricula)"

Unless the SAS contains a stipulation which identifies a particular degree program or programs, the SAS does not list degree programs specifically.

Listing of Locations

Places at which an institution conducts its activities are shown in the "Locations" section of the Statement of Affiliation Status (a) **specifically** by giving the city or town or (b) **generally** by giving the state, region (e.g., community college district) or generic location (e.g., military bases).

A. The "Locations" section must include **all** locations, either **specifically** or **generally.**

B. A location falling under the following rules will be listed **specifically:**

1. The home campus (or home office for institutions which have no home campus).

2. A location not the home campus that has a full-time administrator assigned to it; "administrator" means someone with principally non-clerical duties.

3. A location that either the institution or the Commission wishes to be shown specifically even though the location does not fall under B1 or B2.

C. The location of all other activities will be noted generally.

Clearly, following this formula some institutions will have SASs that are very general; in such cases, the Commission knows of the various educational sites, but does not require their listing.

A Sample SAS

In its final form, a Statement of Affiliation Status might look like this:

AFFILIATION STATUS OF
JOHN DEWEY COLLEGE
1100 South State Street
Chicago, IL 60605

(Effective March 3, 1989)

CONTROL:	John Dewey College is a private not-for-profit institution.
STATUS:	John Dewey College is accredited by the Commission on Institutions of Higher Education of the North Central Association of Colleges and Schools. Accredited: 1952-
EDUCATIONAL PROGRAMS:	The College offers programs leading to the Bachelor's (arts and sciences and professional curricula) degree and the Master's (professional curricula) degree. It also offers credit courses not part of these degree programs.
LOCATIONS:	The College offers courses and programs at its campus in Chicago, Illinois; some courses and some programs are also offered at Moline, Galena, and Dixon, Illinois, and at various locations within Illinois.
STIPULATIONS:	None.
REPORTS REQUIRED:	None.

FOCUSED EVALUATIONS: The College is scheduled for an evaluation in 1993-94 focused on the success of the College in improving its financial condition and its development at the graduate level.

COMPREHENSIVE EVALUATION: John Dewey College's most recent comprehensive evaluation occurred in 1988-89. Its next comprehensive evaluation is scheduled for 1998-99.

Note: In the sample shown, the **Educational Programs** section indicates that John Dewey College offers at least one B.A. or B.S. program and one program leading to some other baccalaureate degree (e.g., B.S.N., B.B.A.) It also offers at least one professional master's program (e.g., M.B.A., M.ED., M.M.)

Note: In the sample shown, the **Locations** section indicates that the Moline and Galena sites are large enough to have full-time administrators. John Dewey College also offers courses and a few programs at other sites.

CHAPTER IV

THE EVALUATION PROCESS

Comprehensive Evaluations

The Commission's process of evaluation for both initial and continued candidacy or accreditation has been formulated to determine whether an institution meets the General Institutional Requirements and the Evaluative Criteria for Accreditation or Candidacy. The Commission makes this determination through an evaluation that is **comprehensive** in scope. These evaluations examine functions and operations of the whole institution in light of the appropriate set of Criteria. They produce recommendations and, ultimately, Commission actions concerning (a) whether an institution should be granted initial or continued candidacy or accreditation; (b) whether its candidacy or accreditation should be accompanied by any stipulations (e.g., that the institution's accreditation or candidacy be limited to offering only certain degrees); (c) whether any reports should be filed and/or focused evaluations should be conducted before the next comprehensive evaluation; and (d) when the next comprehensive evaluation should be conducted.

Initiating the Process

Unaffiliated institutions initiate the evaluation process for initial candidacy or accreditation by formally contacting the Director of the Commission. The Commission office provides the institution with a copy of the *Handbook of Accreditation* and a **Preliminary Information Form** (see Appendix B) which is designed to assist the institution in preparing the materials needed to demonstrate that it meets the General Institutional Requirements (GIRs). The institution then submits its Preliminary Information Form response to the Commission where it is reviewed by staff. Following the review, the institution is provided with a copy of the staff analysis. If questions have been raised about one or more of the GIRs, this is indicated on the analysis. When the review indicates probable compliance with all of the GIRs, the institution is counseled to begin its preparation for a comprehensive evaluation and is assigned to a Commission staff member.

In either case, a completed Self-Study Report—not a completed Preliminary Information Form—is the institution's formal application for affiliation with the Commission.

Institutions currently affiliated with the Commission are scheduled for evaluation by previous Commission action. (The timing

may be altered by changes within the institution—see Chapter VI.) Approximately two years before that scheduled evaluation, the Commission staff member assigned to the institution sends the Executive Officer a reminder letter about the forthcoming evaluation visit. In response, the Executive Officer reviews the SAS, names the institution's self-study coordinator, and chooses dates for the evaluation visit. At this time, the institution is also asked to develop and submit a plan for its self-study process which briefly describes the study's design, strategies and timetable.

One year before the evaluation visit, the institution receives another letter of reminder. In response, the Executive Officer confirms the time and purpose of the scheduled visit and indicates the competencies the institution would like to see represented on the evaluation team. Focused evaluations called for by previous Commission actions follow this same procedure.

Since the Commission reserves the right to reconsider the affiliation of an institution at any time, it may call for a comprehensive or focused evaluation when it believes one is warranted. In such cases, the Commission reserves the right to specify both the timing of the evaluation and the materials to be used, without the usual cycle of reminder letters and without the usual requirement (in the case of comprehensive evaluations) that the institution undertake a comprehensive self-study process and prepare a Self-Study Report. The Commission will provide clearly specified reasons for its decision. Focused evaluations to assess institutional change may be initiated by the Commission or the Commission staff as circumstances warrant. (See Chapter VI.)

The Self-Study Institute

One- and two-year reminder letters also encourage the institution to send representatives to the Commission's Self-Study Institute during the North Central Association's Annual Meeting held in Chicago in early spring. The Institute provides guidance about various elements of the self-study and accreditation processes, an opportunity to review Commission policies and procedures and to examine sample self-studies, and a chance to exchange information and ideas with people from other institutions which are or have recently been engaged in self-study.

Attendance at the Self-Study Institute is voluntary. The Institute is open to all persons interested in self-study; it is particularly useful for self-study coordinators, steering committee members, executive officers and trustees of institutions scheduled for evaluations in the next two years. Program information and registration materials are published in the November issue of the Commission's *Briefing* newsletter.

Commission Staff Assistance

The Commission staff member reviews the institution's self-study plan, provides counsel about ways to integrate the self-study process for Commission evaluation with an institution's ongoing evaluation and planning programs, develops a proposed team for the evaluation visit, and reviews the final draft of the institution's Self-Study Report. It should be clearly understood, however, that staff members *do not* make candidacy or accreditation decisions or recommendations.

The Self-Study Process

The process of institutional self-study is the foundation of the Commission's comprehensive evaluations for initial and continued candidacy and accreditation. The institution plans and undertakes a self-study process to determine how well it meets the Evaluative Criteria and what it can do to improve or enhance its programs and operations. The results of this self-study are summarized in a Self-Study Report which forms the basis for the Commission's evaluation. The completed Self-Study Report constitutes the institution's formal application for initial or continued candidacy or accreditation. *A Guide to Self-Study for Commission Evaluation* provides information on organizing for, conducting, and reporting the results of the self-study process. When it receives the two-year reminder of a forthcoming comprehensive evaluation—if not before—the institution should begin to organize its self-study process.

Choosing an Evaluation Team

While the institution is gathering, evaluating, and beginning to organize its information into a formal Self-Study Report, the Commission staff member assigned to it is developing a proposed evaluation team from among the Commission's corps of Consultant-Evaluators. Several months before the visit is to take place, the staff member sends the proposed team to the institution for comment. Following this institutional review, the Commission formally invites team members to serve. When all members of the evaluation team have accepted the assignment, the institution is formally notified.

Materials for the Evaluation

When an institution being evaluated for candidacy or accreditation has completed its self-study, it prepares a clear, concise narrative report which summarizes the results of its self-study process. This **Self-Study Report** must include the essential components described in *A Guide to Self-Study for Commission Evaluation*. The institution may submit a draft of its report to its Commission staff member for comments and suggestions. The final report, together with completed Basic Institutional Data forms, the latest institu-

tional catalog(s), and faculty and student handbooks are sent by the institution to the Commission (two months before the visits) and to all members of the team (one month before the visit). The Commission's materials, also sent at least one month before the visit, include: (a) the official record of the most recent comprehensive evaluation, (b) the official record of any subsequent evaluation and/or institutional change, (c) a copy of the institution's Statement of Affiliation Status, and (d) the SAS Worksheet. (See *Manual*, Appendix C.)

Evaluation Fee

The Commission bills the institution for the evaluation according to its current Evaluation Fee Schedule. (See Appendix A for the 1988-89 and 1989-90 Evaluation Fee Schedules.) The Commission usually bills all evaluations scheduled for the current year in the fall of that year. The institution must pay the evaluation fee at least one month before the evaluation visit.

The Evaluation Visit

The team makes the evaluation visit. The team validates the institution's self-assessment, gathers comprehensive information about the institution, and summarizes its findings in a written Team Report which assesses whether the institution satisfies the General Institutional Requirements and the Evaluative Criteria. Moreover, the report also offers advice and suggestions for institutional improvement. It concludes with a formal recommendation for accreditation action.

Team members usually arrive the evening before the visit is to begin to review plans for the evaluation. During the visit team members interview members of the administration, the Board, the state coordinating agency, the faculty, the student body, and the community. Before leaving the campus, the team meets with the Executive Officer and others invited by the Executive Officer to summarize its findings and outline its perceptions of institutional strengths and concerns. During this exit interview the team's chairperson also informs the institution of its accrediting recommendation and its rationale for that recommendation. (See *A Manual for the Evaluation Visit* for more detailed information on the evaluation visit.)

The Team Report

Within **four weeks** of the evaluation visit the team chair sends a **draft** of the Team Report, including the team's accrediting recommendation, to the Executive Officer, the other team members, and the Commission staff member assigned to the institution. This draft, labeled **"for correction of errors of fact only,"** should be

read with care by all recipients, and the chair should be informed **immediately** of necessary corrections so that the final report can be produced. If the corrections are substantive, the team chairperson may poll the team members before the final revisions are made. Within six weeks of the evaluation visit, the chairperson submits the **original** of the final Team Report to the Commission. The office of the Commission duplicates the report and mails four copies to the Executive Officer of the institution and one copy to each team member. (For additional information about the Team Report, see *Manual*, Chapter IV.)

The Institutional Response

The Executive Officer of the institution is asked to make a formal written response to the Team Report. This response becomes part of the official record of the evaluation, is considered during the Commission's review process, and is made available to the next evaluation team which visits the institution. The institution sends its response to the Commission and **sends copies to each team member.** It reserves additional copies for distribution to members of the review process.

The Review Processes

The Commission has established two processes for the review of institutional evaluations: the **Readers' Panel** and the **Review Committee.**

Institutions undergoing evaluations for continued candidacy, continued accreditation or focused evaluations are asked to choose the process they prefer. If there is no substantial disagreement between the institution and the team concerning the team recommendations, the institution typically chooses the Readers' Panel; if there is, it asks to be considered by a Review Committee. Review Committee consideration is **required** if the evaluation is for either initial candidacy or initial accreditation, or if the team recommends probation. The review processes are described in detail in Chapter V of the *Manual for the Evaluation Visit.*

Response to Review Committee Recommendation

If the institution was reviewed by a Review Committee, the Executive Officer and the team chair are invited to respond in writing to the Review Committee recommendation before the Commission acts on the recommendation. As part of its response, the institution may include any additional materials it thinks will be relevant to the Commission's decision. The responses become a part of the official record and are shared with the next evaluation team.

Commission Action

The Commission conducts several meetings a year at which it considers recommendations on institutions. The recommendations come from Commission staff, Evaluators' Panels, and visiting teams through Readers' Panels and Review Committees. The Commission may accept or modify those recommendations except in cases for which (a) the recommendations of the team and Readers' Panel coincide and (b) the recommendations of the team and Review Committee coincide. In those situations the Commission may accept the recommendations or refer the matter to a Review Committee.

After reviewing all recommendations and institutional responses, the Commission takes official action. A letter from the Director of the Commission, accompanied by a revised Statement of Affiliation Status, to the Executive Officer formally notifies the institution of the Commission's action. If the Commission action is to deny or withdraw accreditation or candidacy, the formal notification sets forth the Commission's reasons for its action.

The Appeals Process

The Constitution of the North Central Association provides for appeal of Commission actions that deny or withdraw accreditation or candidacy. Notice of intent to appeal must be adopted by the institution's governing board and be filed by the institution with the Secretary of the Association not later than thirty days following the date of the Commission's action. Appeal procedures are specified in detail in Association documents which may be obtained from the Commission office.

Withdrawal of Application for Affiliation

An institution may withdraw its application for affiliation without prejudice at any time prior to a decision on that affiliation by the Commission. The withdrawal must be initiated by the legally designated governing body of the institution. The Commission will retain all fees if the application is withdrawn after the evaluation visit has been made.

CHAPTER V

ONGOING MONITORING CALLED FOR BY THE COMMISSION

Reports

In its action, the Commission may require that an institution submit reports addressing specific developments. At least two months before the report is due, the Commission reminds the institution of the report. On receipt of the report, the staff person assigned to the institution may evaluate it or may ask the team chair to review it as it is sometimes difficult for staff to judge whether a report provides the information that the team thought should be submitted. Commission staff have the authority to take certain actions on institutional reports. Staff may:

- eliminate the requirement of a report after receiving and accepting the report;
- change the due date of a report when necessary (e.g., if additional information is needed);
- require follow-up report(s) if staff determines that the report does not demonstrate sufficient progress in alleviating the team's concerns.

The staff member prepares analysis of the report, which includes the team chair's response, if sought, and the staff action on the report. The analysis is sent to the institution and, if appropriate, the team chair. Staff actions on institutional reports are reported to the Commission. In some cases, information in a report may lead staff to seek other action from the Commission, such as the requirement of a focused visit or a stipulation. If such action is sought, a staff analysis which includes the staff recommendation is provided to the institution, the team chair, and the Commission.

Focused Evaluations

Focused evaluations occur between comprehensive evaluations and examine only certain aspects of an institution. Focused evaluations are not primarily concerned with determining whether an institution fulfills the Evaluative Criteria for Accreditation. Instead they are meant to monitor specific developments and changes at an institution or to follow up on concerns identified by a previous evaluation process. The Commission may call for a focused evaluation as part of its accrediting action, and either the

Commission or the Commission staff may schedule such an evaluation under Commission policies concerning institutional change (see Chapter VI). In either case, focused evaluations do not require a complete institutional self-study.

The recommendations of a focused evaluation team are limited to (a) the focus of the visit; (b) the addition or deletion of stipulations; (c) the need for and timing of any further focused evaluations or written reports before the next comprehensive evaluation; and (d) the timing of the next comprehensive evaluation. In some unique situations a focused evaluation team might recommend that the institution be placed on probation (see Chapter VII). For further information on the focused evaluation, see Chapter V of the *Guide* and Chapter VI of the *Manual*.

Institutional Annual Reports

In the spring of each year, the Commission sends to each affiliated institution an Annual Report form. This report constitutes one significant form of monitoring, for on it institutions provide information about enrollment and financial trends, about changes in degree offerings, and about all off-campus operations. The Annual Report is structured around the Statement of Affiliation Status and the Commission staff review the reports to assure that institutional operations continue to fall within the parameters of the SAS. The Commission considers the Report to be such a useful tool in its monitoring that it will consider invoking sanctions on an institution which fails to supply the report after repeated requests.

CHAPTER VI

INSTITUTIONAL CHANGE

The Commission and Institutional Change

The Commission recognizes that change within the institutions affiliated with it is as constant and rapid as it is challenging and inevitable. It also realizes that change is, for the most part, healthy. Consequently, it does not attempt to interfere with an institution's efforts to respond creatively to the many internal and external forces which demand that it develop and modify its functions and operations if it is to grow or, often, even survive. Most institutional changes—such as developing new majors and concentrations or phasing out others, changing personnel, adding or dropping courses, redefining program requirements—fall within the mission and scope of the institution, do not require special notification of the Commission, and do not affect its candidate or accredited status with the Commission.

The Commission monitors crucial changes within an institution in a number of ways: by requiring that all institutions affiliated with it submit annual reports that include information about such changes; by requiring reports focused on a particular aspect of the institution; and by scheduling evaluations focused on specific developments or concerns within an institution.

Commission Policy on Change

To make a clear distinction between those institutional changes that require explicit Commission approval and those that do not, the Commission has established a "Policy on Changes Affecting the Affiliation Status of an Institution." The policy states that:

- the Statement of Affilistion Status sets forth in full the status of an institution with the Commission;
- institutional change and corresponding alteration of the SAS must be approved under the authority of the Commission before the change is effected by the institution;
- an institution planning such change must request approval of the change and corresponding SAS alteration, and must provide written materials describing the change proposed and its effect on other parts of the institution;
- recommendations to the Commission for approval of the institutional change and the corresponding SAS alteration

may be made by the staff, by a panel of evaluators, or by an evaluation team; evaluation visits either before or after the institutional change is effected may be required, but a visit is not always required before approval;

- a request for approval of institutional change and the corresponding alteration of the SAS may be withdrawn by an institution at any time before the final action is taken, and no reason for withdrawing the request need be given;

- if the institutional change is approved, the institution is free to effect the change; **if approval is denied, effecting the change automatically terminates candidate or accredited status.**

Examples of Changes Covered by the Policy

The most common changes covered by this policy may be grouped according to the basic elements of the Statement of Affiliation Status they would alter. Examples of such changes include:

- changing an institution's private or public character (including changes in the denominational character of a religiously-affiliated institution)

- changing an institution's non-profit or proprietary character

- seeking system accreditation rather than separate accreditation of individual units within a system (or vice-versa)

- seeking to offer degree programs other than those specified in the SAS

- offering credit courses outside of degree programs (see p. 39)

- adding off-campus sites

- adding out-of-state or out-of-country sites (including military base sites)

- altering stipulations or limitations in the SAS

- delaying a scheduled evaluation

Institutions contemplating change should, on their own initiative, send a letter requesting approval of the change under the policy and procedures described in this chapter.

Initiating a Change Request

Affiliated institutions may initiate the Commission's change procedures at any time. (Institutions appealing from a decision of the Commission are excluded from initiating a change.) The institution must provide a written request for approval of an institutional change affecting its affiliation and the corresponding alteration in its Statement of Affiliation Status. **The request must be made early enough so that approval can be provided before the change is effected and the SAS thereby made incorrect.** Since many changes require Commission action, careful attention should be paid to the timing of the request.

The request must specify the alteration desired in the Statement of Affiliation Status and **must provide the following information:**

1. A concise statement of the requested change and the reasons for proposing it.
2. Evidence that the institution has the necessary internal and external approvals to initiate the change.
3. Evidence that the purposes of the change are clear and appropriate to the institution's purposes.
4. An analysis of the anticipated effect of the proposed change on the other parts of the institution.
5. Evidence that the institution has organized adequate human, financial and physical resources and processes to initiate, maintain, and monitor the change and to assure acceptable quality.

Processes for Approval of Change Requests

A recommendation to approve the change and the corresponding alteration in the SAS can be made to the Commission in a number of ways:

- **Through Commission staff.** A Commission staff member may recommend to the Commission approval of a proposed change under certain circumstances. Such a recommendation requires that there have been an evaluation visit within two years before the change is effected or that one will occur within two years. Any visit scheduled within two years following the change will include evaluation of the change that has been made. If the staff member believes that the nature of the change requires consideration by more than one person, the staff member may require that the change be considered by an Evaluators' Panel, or may urge the institution to request a focused visit.

- **Through an Evaluators' Panel.** An Evaluators' Panel consists of three persons drawn from the Consultant-Evaluator Corps. Each panel member is asked to recommend either (a) that the change and the corresponding alteration in the SAS be approved, or (b) that a focused visit be scheduled to evaluate the change before it is effected. The decision of a majority of the evaluators will be the decision of the evaluators as a group. If the Evaluators' Panel recommends a focused visit, the institution may request that a visit be scheduled or it may withdraw its request. If the request is withdrawn, the institution must wait one year before resubmitting a request for an Evaluators' Panel for the same change.

- **Through an evaluation visit.** An institution may always request a visit or use an already scheduled visit to seek approval of a proposed change.

Recommendations to approve an institutional change and the corresponding alteration in the institution's SAS will pass to the Commission at its next scheduled meeting. If an evaluation visit has been conducted, the recommendations of the team will be reviewed by a Readers' Panel and/or Review Committee before coming to the Commission. The Commission has the option to require further information (and, if necessary, an evaluation visit to gather it) before acting.

The time required to formulate staff and/or Evaluators' Panel recommendations concerning alterations in the Statement of Affiliation Status will not normally exceed one month from the date of receipt of the institution's completed written materials. The recommendations will be considered by the Commission at its next regularly-scheduled meeting.

Rescheduling Evaluations

In certain circumstances an institution may seek to reschedule an evaluation called for by previous Commission action. Such requests should be submitted to the Commission staff in writing and must provide explicit and compelling reasons for the change. The Commission staff have limited authority to approve changes in the date of an evaluation provided that the change is no longer than one year and the rescheduled visit continues to be held within the periodic review requirements of the Commission for accreditation or candidacy. Requests for rescheduling of evaluations which exceed these limitations are referred to the Commission for action. The Commission receives a report of all rescheduled evaluations approved by staff.

Limited Course Offerings Not Part of Degree Programs

To enable institutions to respond to constituency needs, particularly by offering a very few courses outside of degree programs, the Commission grants its staff authority to make appropriate changes in an institution's SAS. When an institution plans to offer **no more than five courses or twenty semester hours at its current location(s)** in any calendar year:

- It sends to its Commission staff member a complete description of the course(s), including vitae for the faculty, course syllabi, clientele to be served, educational resources available for students, and (if necessary) certification of operating authority from governmental agencies.
- On receipt of all necessary information, the Commission staff member may revise the institution's Statement of Affiliation Status. Transmission of the revised SAS to the institution constitutes Commission approval for the institution to offer the course(s).
- Once the "Educational Programs" section of the SAS includes a reference to "a limited number of courses not part of the degree programs," the institution need not inform the Commission of deletion and addition of such courses unless the number exceeds the limits stated above as specified by Commission policy. When an institution plans to offer more than this limited number of courses not part of its degree programs, it must follow the policy on "Changes Affecting the Affiliation Status of an Institution" described earlier in this chapter.

The Commission receives a report of all limited course offerings approved by staff at its next meeting.

Separately Accreditable Institutions

The accreditation of an institution includes all its components, wherever located. A component of a larger institution may be separately accreditable if a significant portion of responsibility and decision making for its educational activities lies within the component and not in the other parts of the larger system.

The Commission determines, following consultation with the CEO of the institutional system, (1) whether the system will be accredited or whether its components will be separately accredited, and (2) how the evaluation will be conducted.

Transfer of Accreditation

The Commission may transfer the accreditation of an institution to a new legal entity or to a system. The transfer must be confirmed by an evaluation visit to the institution within two years.

CHAPTER VII

SANCTIONS

From time to time the Commission must apply sanctions against its affiliated institutions. Currently the Commission has three sanctions: Memorandum for the Record, Probation, and Commission Withdrawal of Affiliation.

Memorandum for the Record

The Memorandum for the Record is the sanction applied to an institution which initiates a change without receiving Commission approval. The policy states:

> The Memorandum for the Record is an official Commission letter which indicates that an institution, because of its initiation of institutional change without required prior Commission approval, has violated its institutional obligations of affiliation.
>
> The Memorandum is sent to the institution by Commission staff together with appropriate procedures for Commission approval of institutional change. The Memorandum becomes a part of the institution's official file and will be shared with the next visiting team.
>
> This policy does not apply to an institution which has initiated change after failing to receive Commission approval of the change (see Policy 1.C.1). (NOTE. The policy says that in such situations an institution's accreditation will be automatically withdrawn.)

Probation

Probation is a public status signifying that conditions exist at an accredited institution which endanger its ability to meet the Commission's Criteria for Accreditation. In placing an institution on probation the Commission identifies in the institution's Statement of Affiliation Status (1) the specific conditions which led to the probation, and (2) the date of the institution's next comprehensive evaluation, at which time the institution must provide clear evidence of its progress toward ameliorating those conditions.

Only the Commission, acting on a recommendation made to it, can place an institution on probation. A recommendation that an institution be placed on probation may be made to the Commission (1) by a comprehensive or focused visit team, (2) by a Review Committee, or (3) if conditions appear to warrant Commission action without a team visit, by the Director of the Commission. A

team recommendation for probation is automatically referred to a Review Committee. In all cases, the Commission acts on a recommendation for probation only if the institution's Executive Officer has been given opportunity to place before the Commission a written response to the recommendation.

The Statement of Affiliation Status of an institution on probation is available on request from the Commission after the institution has been notified officially of its probation. Probation is also noted in the Commission's published lists of affiliated institutions. An institution on probation must disclose this status whenever it refers to its North Central accreditation.

Withdrawal of Affiliation

The Commission, after due and careful consideration, can withdraw the affiliation of an institution. As well as requiring proper conformity with Commission policies and procedures, "due and careful consideration" involves an evaluation, including a team visit within the year preceding Commission withdrawal of affiliation. An institution may also lose its affiliation if it fails to meet institutional obligations of affiliation within a designated time after being warned of non-compliance. Unless the institution makes special arrangements with the Commission, its affiliation is withdrawn if it ceases to operate as an educational institution.

Reapplication Following Withdrawal of Affiliation

When the Commission withdraws the affiliation of an institution—either candidacy or accreditation—it will not consider an application for affiliation from the same institution until a period of at least two years has elapsed following the date withdrawal action became effective (exceptions may be made by the Commission).

Appeals

Institutions have the right to appeal from a Commission decision that denies or withdraws accreditation or candidacy. The appeal is made outside the Commission under procedures established by the Board of Directors of the North Central Association, as provided in the Constitution of the Association. In its Rules of Procedure the Board has specified that the grounds for such an appeal are "(a) that the Commission based its decision on factual information that was substantially incorrect, not related to the Commission's criteria for such decisions, or of insufficient weight to support the decision; and/or (b) that the Commission in making its decision departed significantly from its procedures established in writing or by custom."

The appeal process is specified in detail in actions of the Association Board, and requires, among other things, that notice of intent

to appeal be an official action of the institution's governing board and be filed with the Secretary of the Association not later than thirty days after the Commission's action. The "Summary of Appeals Procedure" is available on request from the Commission office.

CHAPTER VIII

INFORMING THE PUBLIC

Publication of Affiliation by the Institution

The Commission recommends the following form for disclosing in catalogs, advertisements, brochures, and other publications that the institution is accredited by the North Central Association:

> **(Name of institution) is accredited by the Commission on Institutions of Higher Education of the North Central Association of Colleges and Schools.**

If for reasons of space a shorter form is necessary, the wording can be abbreviated by omitting reference to the Commission:

> **(Name of institution) is accredited by the North Central Association of Colleges and Schools.**

If the institution is a candidate, the words "accredited by" should be replaced with "a candidate for accreditation with."

North Central accreditation has reference to the *institution* as a *whole*. **Statements like "this program is accredited by North Central", or "this degree is accredited by North Central" are incorrect and must not be used.** Moreover, the phrases **"fully accredited"** or **"full accreditation"** must be avoided, since no partial accreditation is possible.

The North Central Association is a membership organization whose members are the institutions accredited by a Commission of the Association; thus "member institution" and "accredited institution" are synonymous. *Reference to "membership" must therefore be limited to accredited institutions;* candidate institutions are not "members" of the North Central Association, although they are affiliated with it.

An institution on probation must disclose this status whenever it refers to its North Central accreditation.

Phrases such as "accreditation has been continued for a ten-year period" should never be used. *North Central accreditation is not for a specific period of time but is a continuing relationship between the institution and the Association which is subject to*

reconsideration periodically or when necessary. The timing of the next comprehensive evaluation which is specified in the accreditation action of the Commission is subject to alteration if significant changes occur in an institution. Annual reports from institutions and other information are regularly examined to see whether changes have occurred (or are anticipated) that would necessitate a different time for the next evaluation. Thus, while Commission policies dictate that every institution must be evaluated at least once every ten years, many institutions are evaluated more frequently. **Since the timing of the next evaluation is subject to change, an institution should avoid emphasizing it unduly.**

Public Distribution of the Team Report

After final Commission action, each institution may make public the entire Team Report or excerpts that are accurate (i.e., verbatim or reasonable paraphrases) and which correctly reflect the entire report in its balance of strengths and concerns. If it distributes excerpts, the institution should indicate that the full report is available on request. The Commission does not make the report public without the permission of the institution unless an institution misrepresents it.

The Commission encourages an institution to distribute the Team Report among all of its constituencies. However, when distributing the report, the institution must point out that the Team Report does not constitute a summary of the entire North Central evaluation process; it is only the report of the team that visited the institution. Since the Commission's review processes sometimes result in an accrediting action other than the one the team recommended, misunderstandings occur if the preliminary nature of the Team Report has not been made clear.

Publication of Affiliation by the Commission

An institution's candidate or accredited status with the Commission is listed in the North Central Association *Quarterly* beginning with the Spring issue after official action is taken. Supplements to the *Quarterly* are produced after each Commission meeting at which institutional actions are taken. Reports of institutional actions taken by the Commission are also published in the CIHE *Briefing* newsletter. When an institution is on probation, that status is noted in the Commission's published lists of affiliated institutions and its supplements.

Public Disclosure of the Statement of Affiliation Status

An institution may make its Statement of Affiliation Status public as long as it discloses the entire statement. In responding to inquiries regarding an institution's affiliation with the Commission, the Commission staff will explain that affiliation status and, when

appropriate, will also disclose the following information drawn from the SAS: a description of the institution and its control; its principal educational programs and instructional location(s); any stipulations attached to the institution's affiliation; the *dates* of required reports and scheduled focused evaluations; and the *date* of the most recent comprehensive evaluation and the timing of the next comprehensive evaluation. The Commission staff will disclose the entire Statement of Affiliation Status only with an institution's approval; however, the SAS of an institution on probation is available on request from the Commission after the institution has been notified officially of its probation.

Complaints Against Affiliated Institutions

Most institutions have well defined grievance procedures through which they respond to a variety internal problems. The Commission office has a similar responsibility to its members to receive complaints from individuals or groups. To guide its actions in such matters, the Commission adopted a policy which establishes specific limitations within which it will handle complaints. The policy is provided in full here; it is also reproduced in the *Overview* brochure which serves as the Commission's primary printed response to most inquiries.

> The Commission will investigate complaints regarding allegations of conditions at affiliated institutions which raise significant questions about the institution's ability to continue to meet the Commission's General Institutional Requirements and Evaluative Criteria for Accreditation or Candidacy.
>
> The Commission does not adjudicate isolated individual grievances with an institution. Complaints of that nature, documented and signed, will be forwarded to the institution. Should several individual complaints against an institution suggest a particular pattern of problems which might affect the institution's ability to meet the Commission's Criteria, the Commission may authorize further investigation.
>
> Complaints of a more widespread or public nature (e.g., complaints accompanied by documents available to the public such as articles and advertising) will also be submitted to an institution for response. These complaints will be forwarded without identifying the complainant. If the Commission staff member decides that the institutional response satisfactorily addresses the complaint, the complaint and the response will be kept on file but not given to the next evaluation team to visit the institution.
>
> If the Commission staff member determines that an institutional response does not satisfactorily address the complaint, the complaint together with a staff analysis of it will be forwarded to the

Commission for further review. All complaints receiving Commission review will be shared with the next evaluation team to visit the institution.

At no time will the Commission act on a complaint being dealt with through established institutional grievance procedures or through the courts.

Unless supported by documents available to the public, all complaints, to be considered valid, must be signed and must represent first hand knowledge of the substance of the complaint.

APPENDIX A

COMMISSION EVALUATION FEE SCHEDULE

FEES FOR TEAM VISITS TO INSTITUTIONS

FIXED FEE BASIS. The Commission schedule of fixed fees for evaluation visits is based on the size of the team and the length (number of days) of the visit.

General criteria for determining team size for evaluations for **initial or continued accreditation** (generally three-day visits):

Highest Degree Level Offered	Size of Team
Certificate & Associate (FTE = 1-1,999)	4 team members
Certificate & Associate (FTE = 2,000-more)	5 team members
Bachelor's (FTE = 1-1,999)	4 team members
Bachelor's (FTE = 2,000-more)	5 team members
Master's and Specialist	5 team members
Doctoral	8 team members

Usual team size for other types of evaluations (for all institutions):

Type of Evaluation	Size of Team
Initial Candidacy (three days)	4 team members
Continued Candidacy (two days)	2-3 team members
Focused (two days)	2 team members

FIXED FEE TABLE. (N = number of persons on team.)

1988-89 Evaluation Fee Schedule

	N = 1	N = 2	N = 3	N = 4	N = 5	N = 6	N = 7	N = 8
1 day	1400	2250	3100	3950	4800	5650	6500	7350
2 days	1550	2550	3550	4550	5550	6550	7550	8550
3 days	1700	2850	4000	5150	6300	7450	8600	9750

1989-90 Evaluation Fee Schedule

	N = 1	N = 2	N = 3	N = 4	N = 5	N = 6	N = 7	N = 8
1 day	1425	2300	3175	4050	4925	5800	6675	7550
2 days	1575	2600	3625	5050	5675	6700	7725	8750
3 days	1725	2900	4075	5250	6425	7600	8775	9950

COST-PLUS BASIS. The fee to the institution for a cost-plus visit: direct cost of the visit + 10% of direct cost.

FEES FOR OTHER TYPES OF EVALUATIONS

	1988-89	1989-90
FEES FOR PRE-VISITS BY TEAM CHAIRS		
First day	$850	$875
Each succeeding day of same visit	$150	$150
FEES FOR GENERALIST SERVICE		
First day	$850	$875
Each succeeding consecutive day of same visit	$150	$150
FEES FOR EVALUATORS' PANEL PROCESS	$400	$400
FEES FOR CONFIRMATION VISITS	Cost-plus	Cost-plus

APPENDIX B

PRELIMINARY INFORMATION FORM

from institutions considering affiliation with the Commission

Institutions of higher education may be affiliated with the Commission and the Association either as candidates for accreditation or as accredited (member) institutions. While the Evaluative Criteria for these two forms of affiliation differ, all institutions must meet the General Institutional Requirements. This document is designed to assist institutions considering affiliation with the Commission. It addresses only the General Institutional Requirements, describing the information usually needed to demonstrate that the institution meets those requirements. Further information on the Evaluative Criteria and the policies and procedures of the Commission are found in other Commission documents.

The information requested in this document is needed for Commission staff review, so that the staff can counsel the institution on its further steps in seeking affiliation. The information requested, including copies of the **institution's catalogs, handbooks, audited financial statements, and other supporting materials** requested, should be returned to:

Director
Commission on Institutions of Higher Education
North Central Association of Colleges and Schools
159 North Dearborn
Chicago IL 60601.

Information should be provided on separate sheets, following the pattern of this document. The Commission does not assess any fees for the staff review.

Providing this information does not constitute an application for consideration by the Commission; the completed self-study document which serves as the basis for an evaluation is the only application. An institution providing information does not commit itself to an evaluation by the Commission, nor does the institution establish any affiliation with the Commission until Commission action is taken to grant candidacy or accreditation. The actual judgment of whether an institution meets both the General Institutional Requirements and the Evaluative Criteria is made as a part of the evaluation process through an evaluation visit, review, and Commission action.

From this information, Commission staff prepare an analysis on whether the institution appears to meet each of the General Institutional Requirements. That analysis is sent to the institution. Any items in question will be noted in the analysis. No further steps will be taken until all questions have been resolved. When the staff analysis shows that the institution appears to meet the General Institutional Requirements, the institution is advised to prepare a self-study document in which it addresses the Evaluative Criteria for accreditation or candidacy (as appropriate). Upon completion of the self-study document (which is the formal application for consideration), and following determination by staff that the document appears adequate for the evaluation, the staff will make arrangements for a Commission evaluation, beginning with an evaluation visit by a team of Commission consultant-evaluators. The staff analysis is shared with the team scheduled to visit the institution.

SECTION A: GENERAL INFORMATION

1. The Bylaws of the North Central Association provide that "membership in the Association for institutions is voluntary and must be initiated by the legally designated governing body of the institution." Has the governing board of the institution approved initiating affiliation with North Central? If so, when? Include a copy of the action authorizing this step.

2. With what accrediting bodies is the institution currently affiliated?

3. With what accrediting bodies has the institution been affiliated in the past?

4. If the institution is under public control please state the jurisdiction(s) providing control (e.g., state, city, district).

5. If the institution is a private, not-for-profit institution please state:

   its form of organization (e.g., corporation); please provide with this form copies of the legal documents relating to organization (e.g., certificate of incorporation and bylaws);

   the date of the currently effective federal Internal Revenue Service determination that the institution is a not-for-profit educational organization. Enclose a copy of the IRS notification.

6. If the institution is a private for-profit organization please state:

   its form of organization (e.g., corporation); please provide with this form copies of the legal documents relating to organization (e.g., certificate of incorporation and bylaws) (include all related holding companies and information on subsidiary corporations);

   the names and addresses of the owners (if a corporation, the names and addresses of those each of whom holds 20% or more of the voting stock);

   the names, positions and locations of the members of related corporate boards.

SECTION B: GENERAL INSTITUTIONAL REQUIREMENTS

In several cases information is requested that may be available in the institution's catalog or other publication(s). In such cases, please provide the publication(s) and in responding to the questions specify where in the publication(s) the appropriate evidence is found.

Mission and authorization

1.a. The institution has formally adopted and made public its statement of mission.

(1) Provide the statement of mission of the institution.

(2) When was this statement adopted? By what body (or bodies)?

(3) Where is the statement of mission published, or otherwise made public? Enclose a sample, preferrably the catalog.

1.b. The statement of mission is appropriate to an institution of higher education.

(1) Explain why the statement of mission is appropriate both to an educational institution and to an institution of higher education.

1.c. The institution confers certificates, diplomas or degrees.

(1) List the certificates, diplomas, and/or degrees awarded by the institution.

1.d. The institution has legal authority to confer its certificates, diplomas and degrees.

(1) From what body, or under what statutory provision, did the institution receive the legal authority it currently relies on to award certificates, diplomas and degrees?

(2) Provide photocopies of the documents providing notice to the institution of this authority.

(3) Does the institution hold any additional legal authority to confer certificates, diplomas or degrees? If so, describe this additional authority.

1.e. The institution meets all legal requirements to operate wherever it conducts activities.

(1) At what locations does the institution conduct its activities?

(2) By what body or under what statutory provision was authority granted to operate at each of these locations?

(3) Provide photocopies of the documents providing notice to the institution of the authority to operate at each location.

Educational Program

2.a. The educational programs are compatible with the institution's mission.

(1) Identify the educational programs of the institution.

(2) On what basis do you claim that these programs are compatible with the institution's mission?

2.b. The principal educational programs are based on recognized fields of study at the postsecondary level.

(1) Identify those educational programs the institution regards as its principal programs.

(2) Identity the discipline(s) (or scholarly field(s)) on which they are based.

2.c. At least one of the undergraduate programs is two or more academic years in length (or the equivalent). If no undergraduate programs are offered, at least one of the graduate programs is one or more academic years in length (or the equivalent).

(1) Identify whether a program is an undergraduate or graduate.

(2) Identify the normal length of time required by a full-time student to complete the program.

2.d. General education at the postsecondary level is an essential element of undergraduate degree programs and a prerequisite to graduate degree programs.

NOTE: The Commission's understanding of the term "general education" was given in its 1983 Statement on General Education:

General education is 'general' in several clearly identifiable ways: it is not related to a student's formal technical, vocational or professional preparation; it is a part of every student's course of study, regardless of his or her area of emphasis; and it is intended to impart common knowledge, intellectual concepts, and attitudes that every educated person should possess.

(1) Provide the rationale for the program of general education offered by the institution.

(2) State how general education at the postsecondary level is required as an essential element of programs identified under 2.c. above.

(3) Give evidence that admissions requirements assure that a program of general education is a prerequisite to programs which do not include general education.

2.e. General education and/or a program of related instruction at the postsecondary level is an essential element of undergraduate certificate and diploma programs two or more academic years in length.

NOTE: The term "related instruction" is drawn from the usage in vocational-technical education: instruction broadening a curriculum beyond purely vocational purposes, but closely associated with those purposes. Such instruction commonly provides for the development of knowledge and skills in language, mathematics and human relations.

(1) Identify the institution's programs which fall under this requirement.

(2) Provide the rationale for the program of related instruction or general education found in those programs.

2.f. The certificate, diploma or degree awarded upon successful completion of an educational program is appropriate to the demonstrated attainment of the graduate.

(1) Describe the graduation requirements and their appropriateness to the certificates, diplomas and degrees awarded.

Institutional organization

3.a. There is a governing board, legally responsible for the institution, which establishes and regularly reviews basic policies that govern the institution and protect its integrity.

(1) Provide a copy of the bylaws or other basic institutional document identifying the group legally responsible for the institution (the governing board).

(2) Enumerate the duties and responsibilities of the governing board as prescribed by law or by the institution's bylaws.

(3) Describe how the governing board regularly reviews basic policies.

3.b. The governing board includes individuals who represent the public interest. (NOTE: In rare situations the Commission may approve alternative means by which the interests of the public are appropriately represented when unusual circumstances prohibit public representatives on the board.)

(1) Provide a list of the current members of the governing board. Include name, address and occupation for each member.

(2) Describe how members of the governing board are selected.

(3) Identify those members of the governing board who are remunerated by the institution through salaries, wages or fees regularly or occasionally (reimbursed expenses are not remuneration).

(4) Identify those governing board members (if any) who are creditors of the institution, guarantors of institutional debt, or active members of businesses of which the institution is a customer.

(5) Identify those members of the governing board regarded by the institution as reflecting the public interest.

3.c. An executive officer is designated by the governing board to administer the institution.

(1) Identify the executive officer charged with administering the institution.

(2) Provide that officer's title.

(3) Give evidence that that officer was appointed by the governing board.

(4) Provide the date of appointment for that officer.

(5) Give the office mailing address and telephone number of that officer.

3.d. A faculty comprising persons qualified by education and experience is significantly involved in the development and review of the educational programs.

(1) Identify the people who constitute the faculty and provide a summary of their qualifications

(2) Explain the role faculty play in developing and reviewing the institution's educational programs.

3.e. Admissions policies are consistent with the institution's mission and appropriate to the educational programs.

(1) Provide a copy of the institution's admissions policies including any special requirements for individual programs.

(2) Explain how these policies assure that the institution identifies prospective students who are both appropriate to the institution's mission and to the specific programs.

3.f. Admissions practices conform to the admissions policies.

(1) Give a statistical summary of the students admitted over the past three years (e.g., applicants, admissions, required scores, etc.)

Financial resources

4.a. The institution has financial resources sufficient to support its activities.

(1) Provide (on one page, if possible) the institution's financial operating statement for each of the past three years.

(2) Provide (on one page, if possible) the institution's current projection of its financial operating statement for each of the next three years, using the same format used for the response as under (1) above.

(3) Provide a copy of the institution's balance sheet at the conclusion of the most recent fiscal year.

(4) Comment on the sufficiency of financial resources as shown on the financial reports provided under (1), (2), and (3) above.

4.b. The institution has its financial statements externally audited on a regular schedule by a certified public accountant or state audit agency.

(1) Give the dates for the three most recent externally audited financial statements of the institution and name the firms or individuals who performed the audits.

(2) State the institution's policy on external financial audits of its financial statements.

(3) Provide a copy of the most recent externally audited financial statements, including the auditor's certificate and the notes to the financial statements.

Public disclosure

5.a The institution publishes in its catalog or other appropriate places accurate information that fairly describes

i. **its educational programs,**
ii. **its policies and procedures directly affecting students,**
iii. **its charges and its refund policies,**
iv. **the academic credentials of its faculty members and administrators.**

5.b. The institution makes available upon request accurate information that fairly describes its financial resources.

(1) Identify for each of the areas in 5.a. and 5.b. where information pertaining to it appears in the institution's publications.

(2) State the distribution that each of these publications receives.

APPENDIX C

RULES OF PROCEDURE OF THE COMMISSION ON INSTITUTIONS OF HIGHER EDUCATION

RULE 1: NAME AND AUTHORITY

This organization shall be known as the Commission on Institutions of Higher Education ("the Commission") of the North Central Association of Colleges and Schools ("the Association"). It is established under the Constitution of the Association, and derives its powers from the Constitution. These Rules of Procedure are intended to provide for fulfilling the responsibilities placed on the Commission by the Constitution.

RULE 2: COMPOSITION OF THE COMMISSION

a. The Commission shall comprise fifteen persons called Executive Commissioners: three persons representative of the public and twelve persons broadly representative of institutions of higher education that are members of the Association. All Executive Commissioners shall be residents of a state within the geographic territory of the Association.

b. Each Executive Commissioner who is representative of the public shall have no current active affiliation with an institution of higher education in the geographic territory of the Association.

c. Each Executive Commissioner who is representative of institutions of higher education shall be a full time active appointee of a member institution of higher education of the Association.

d. Each Executive Commissioner shall serve a term of four years unless the term is extended because of election as an officer of the Commission. Terms shall begin on January 1. Terms shall be so arranged that approximately one-fourth of the terms expire each year. An Executive Commissioner shall serve until a successor is chosen and qualified.

e. No person shall be appointed or reappointed to a term or a portion of a term as an Executive Commissioner if by completion of that appointment the person will have served more than seven years as an Executive Commissioner.

RULE 3: MANNER OF ACTION

a. The Commission may adopt policies as it sees fit to exercise the powers and discharge the duties of the Commission that are specified in the Constitution of the Association.

b. Unless otherwise specified in the Constitution of the Association, these Rules of Procedure, or the policies of the Commission, the Commission itself shall take such actions as are required by the Constitution of the Association, or are necessary for the conduct of Commission business.

Note: The following powers and duties of the Commission are specified in the Constitution of the Association, and are inserted here for reference:

a. To establish policies and procedures by which the activities of the Commission shall be carried out, including the selection of officers and committees for the Commission.

b. To establish criteria which, when met, entitle an educational institution to receive the status of accreditation, and to establish procedures by which the determination of accreditation is made.

c. To establish criteria which, when met, entitle educational institutions to be affiliated with the Association in ways other than membership, and to establish procedures by which the determination of such affiliation is made.

d. To use the name of the Association in the conduct of Commission activities and on Commission publications.

e. To publish books, pamphlets, and other materials needed to carry out Commission activities.

f. To employ persons in the name of the Association.

g. To assess dues and fees to be paid by affiliated institutions, to receive such dues and fees, and after reasonable notice to withdraw accreditation or other affiliation for non-payment of such dues and fees.

h. To disburse funds and otherwise manage the financial affairs of the Commission, but the amount expended by a Commission during a year shall not exceed the revenue it receives during that year plus any amount remaining from the operations of previous years.

c. The Commission may not act to adopt or change any criterion by which the accreditation or other affiliation of an institution is judged until such proposed criteria or changes have been circulated for comment to all institutions affiliated with the Association through the Commission at least one month before the action is taken. Any comment received must be considered by the Commission before action is taken.

RULE 4: MEETINGS OF THE COMMISSION

a. The Commission shall meet at least twice each year, and may have such additional meetings as it wishes.

b. The Commission shall meet within the geographic territory of the Association at such times and places as the Commission shall designate.

c. Notice of a meeting of the Commission shall be provided to each Executive Commissioner at least sixty days in advance of the meeting, and may be provided to other persons by publication or in response to inquiry. The notice of meeting shall state the time and place of the meeting. In case of an emergency, the Commission may hold a meeting without sixty days advance notice, provided there is unanimous agreement of the Executive Commissioners to waive such notice.

d. A quorum of the Commission for the conduct of business shall be ten members.

e. Meetings of the Commission shall not be open to the public at large, but the Commission may adopt policies permitting persons not members of the Commission to attend part or all of Commission meetings.

f. The Commission may take action on any matter within its authority by mail ballot or by a conference using telecommunications under such rules as it may prescribe, provided that no action shall be adopted by fewer than ten affirmative votes.

g. Unless otherwise provided in these Rules or the Constitution of the Association, the meetings of the Commission shall be conducted according to *Robert's Rules of Order, Revised.*

RULE 5: RECORD OF ACTIONS

a. All actions establishing or modifying the affiliation of an institution with the Association through the Commission shall be transmitted in written form to the chief executive officer of the institution promptly after the action has been taken.

b. The Commission shall cause to be prepared and maintained a permanent record of all its actions, and shall distribute that record or make it available for inspection to representatives of member institutions of higher education of the Association, to the Board of Directors of the Association and to such other persons or groups as the Commission may designate.

RULE 6: OFFICERS OF THE COMMISSION

a. The officers of the Commission shall be a Chair and a Vice Chair.

b. The term of office of each officer shall be two years, beginning on January 1.

c. Officers shall be elected as necessary from among the Executive Commissioners by majority vote of the Commission not later than two months before the beginnings of the terms of office.

d. If a person is chosen as an officer, the term of that person as an Executive Commissioner shall, if necessary, automatically be extended until completion of service as an officer, so long as that person meets the requirements for service as an Executive Commissioner.

e. The Chair of the Commission shall preside at all meetings of the Commission, and shall perform other duties required by these Rules or the Constitution of the Association, or customary to the office.

f. The Vice Chair shall perform the duties of the Chair in the absence of the Chair.

g. If the Chair is permanently unable to perform the duties of office, the Vice Chair shall succeed to the office of Chair to complete the unexpired term. In this event a new Vice Chair shall be elected promptly by the Commission to complete the unexpired term of the Vice Chair.

RULE 7: EXECUTIVE COMMITTEE OF THE COMMISSION

a. There shall be an Executive Committee of the Commission which shall have the power to act for the Commission between meetings of the Commission. The powers of the Executive Committee shall be defined in policies adopted by the Commission.

b. The Executive Committee shall comprise the officers of the Commission and two other Executive Commissioners elected for one year terms by the Commission at the meeting of the Commission

first occurring after January 1. Members of the Executive Committee shall serve until their successors assume office.

RULE 8: COMMISSIONERS-AT-LARGE

a. There shall be a group of between seventy-five and one hundred persons (as determined by the Commission), each of whom shall be called a Commissioner-at-large.

b. Each Commissioner-at-large shall be a full time active appointee of a member institution of higher education of the Association and a resident of a state within the geographic territory of the Association.

c. The membership of the group of Commissioners-at-large shall meet the following conditions:

   i. There shall be at least two persons resident in each state within the geographic territory of the Association.

   ii. There shall be at least fifteen persons from institutions in each of the four degree levels:

   - highest degree less than bachelor's;
   - highest degree bachelor's;
   - highest degree above bachelor's but less than doctor's;
   - highest degree doctor's.

   iii. There shall be at least thirty persons from public institutions, and at least thirty persons from private institutions.

d. The term of office of each Commissioner-at-large shall be four years, beginning on September 1. Terms of office shall be so arranged that approximately one-fourth of the terms shall expire in any one year.

e. No one may serve through appointment and/or reappointment more than six consecutive years as a Commissioner-at-large.

f. Commissioners-at-large shall participate actively in the procedures by which institutions of higher education gain or retain affiliation with the Association. This participation shall be defined in policies adopted by the Commission.

RULE 9: STANDING COMMITTEE ON APPOINTMENTS

a. There shall be a standing Committee on Appointments which shall appoint by majority vote persons to serve as Executive Commissioners and as Commissioners-at-large.

b. The Committee on Appointments shall comprise seven persons, as follows:

   i. Three Executive Commissioners, who shall not be officers of the Commission; and

   ii. Four chief executive officers of institutions of higher education that are members of the Association, who shall be neither Executive Commissioners nor Commissioners-at-large.

c. Members of the Committee on Appointments shall be appointed to one year terms by the Commission at the meeting of the Commission first occurring after January 1, and shall serve until successors have been appointed.

d. The membership of the Committee on Appointments shall meet the following conditions:

i. There shall be at least one person from an institution in each of the four degree levels:

- highest degree less than bachelor's;
- highest degree bachelor's;
- highest degree above bachelor's but less than doctor's;
- highest degree doctor's.

ii. There shall be at least two members from public institutions, and at least two members from private institutions;

iii. There shall be no more than one member from a single state;

iv. No one shall be appointed to more than one term on the Committee on Appointments within any four year period.

e. Appointments of persons to full terms as Executive Commissioners or as Commissioners-at-large shall be made by the Committee on Appointments not less than three nor more than six months before the beginning of the respective terms.

f. In the event of vacancies among the Executive Commissioners or Commissioners-at-large arising because of inability or unwillingness to continue service, the Committee on Appointments shall promptly appoint persons to fill the unexpired terms.

RULE 10: CHIEF EXECUTIVE OFFICER

a. The Commission shall appoint a chief executive officer of the Commission, who shall be a full time employee of the Association.

b. The chief executive officer shall have such title as the Commission shall designate, and shall serve such term of office and under such conditions of employment as the Commission shall determine.

c. The chief executive officer shall have primary responsibility for administering the activities of the Commission under the direction of the Commission.

RULE 11: AMENDMENTS TO THE RULES OF PROCEDURE

These rules of Procedure shall be amended by action of the Commission only after the proposed amendment has been circulated for comment to all institutions affiliated with the Association through the Commission at least one month before the action to adopt is taken. Each comment received must be considered by the Commission before action is taken.

APPENDIX D

GUIDELINES ON CONTRACTUAL RELATIONSHIPS BETWEEN AN ACCREDITED INSTITUTION AND OTHER ORGANIZATIONS

The Commission on Institutions of Higher Education of the North Central Association recommends the following principles and guidelines to its member institutions who wish to establish by contract a relationship with other organizations for providing educational services. While these principles and guidelines are not formal requirements of the Commission, institutions departing from them will be expected to justify the departures as reasonable and consistent with the mission and purposes of the institution.

Principles:

In establishing by contract a relationship with another organization to offer educational services, the accredited institution should provide explicitly that:

1. The primary purpose of the services to be offered is educational, and any ancillary purpose is clearly identified.

2. Any course or program offered is consistent with the mission and purposes of the accredited institution, as they were stated at the time of the most recent North Central evaluation. If changes have occurred in the institution's mission and purposes, the institution should notify the Commission, and the Commission's policies and procedures dealing with changes in accredited institutions will be applied.

3. Any course or program offered must be approved by the established procedures of the accredited institution, and the amount and level of credit to be awarded upon successful completion of any course or program must also be approved through the established institutional procedures.

4. Courses offered for credit must remain under the sole and direct control of the sponsoring accredited institution, which exercises ultimate and continuing responsibility for the performance of these functions as reflected in the contract, with provisions to assure that conduct of the courses meets the standards of its regular programs as disclosed fully in the institution's publications, especially as these pertain to:

    a. recruitment and counseling of students
    b. admission of students to courses and/or to the sponsoring institution where credit programs are pursued
    c. instruction in the courses
    d. evaluation of student progress
    e. record keeping
    f. tuition and/or fees charged, receipt and disbursement of funds, and refund policy
    g. appointment and validation of credentials of faculty teaching the course
    h. nature and location of courses
    i. instructional resources, such as the library

Guidelines

The following guidelines are provided for the use of a member institution in preparing a contract with another organization for providing educational services. While these guidelines are not exhaustive, they deal with common issues that should be made explicit in the contract. A member institution is strongly urged to obtain advice from legal counsel on the form and content of the contract, and in particular to determine that, if the institution is a not-for-profit organization, a contract with a for-profit organization will not affect its state or federal tax obligations.

I. The Contract

A. Should be executed only by duly designated officers of the institution and their counterparts in the contracting organization. While other faculty and administrative representatives will undoubtedly be involved in the contract negotiations, care should be taken to avoid implied or apparent power to execute the contract by unauthorized personnel.

B. Should establish a definite understanding between the institution and contractor regarding the work to be performed, the period of the agreement and the conditions under which any possible renewal or renegotiation of the contract would take place.

C. Should clearly vest the ultimate responsibility for the performance of the necessary control functions for the educational offering with the accredited institution granting credit for the offering. Such performance responsibility by the credit granting institution would minimally consist of adequate provisions for review and approval of work performed in each functional area by the contractor.

D. Should clearly establish the responsibilities of the institution and contractor regarding:

a. indirect costs
b. approval of salaries
c. equipment
d. subcontracts and travel
e. property ownership and accountability
f. inventions and patents
g. publications and copyrights
h. accounting records and audits
i. security
j. termination costs
k. tuition refunds
l. student records
m. faculty facilities
n. safety regulations
o. insurance coverage

II. Enrollment Agreement

A. The enrollment agreement should clearly outline the obligations of both the institution and the student, and a copy of the enrollment agreement should be furnished to the student before any payment is made.

B. The institution should determine that each applicant is fully informed as to the nature of the obligation he/she is entering into and as to his/her responsibilities and rights under the enrollment agreement before he/she signs it.

C. No enrollment agreement should be binding until it has been accepted by the authorities of the institution vested with this responsibility.

III. Tuition Policies

A. Rates

1. The total tuition for any specific given course should be the same for all persons at any given time. Group training contracts showing lower individual rates may be negotiated with business, industrial, or governmental agencies.

2. Tuition charges in courses should be bona fide, effective on specific dates, and applicable to all who enroll thereafter or are presently in school, provided the enrollment agreement so stipulates.

3. All extra charges and costs incidental to training should be revealed to the prospective student before he/she is enrolled.

4. The institution should show that the total tuition charges for each of its courses is reasonable in the light of the service to be rendered, the equipment to be furnished, and its operating costs.

B. Refunds and Cancellations

1. The institution should have a fair and equitable tuition refund and cancellation policy.

2. The institution should publish its tuition refund and cancellation policy in its catalog or other appropriate literature.

C. Collection Practices

1. Methods used by an institution in requesting or demanding payment should follow sound ethical business practices.

2. If promissory notes or contracts for tuition are sold or discounted to third parties by the institution, enrollees or their financial sponsors should be aware of this action.

IV. Student Recruitment

A. Advertising and Promotional Literature

1. All advertisements and promotional literature used should be truthful and avoid leaving any false, misleading or exaggerated impressions with respect to the school, its personnel, its courses and services, or the occupational opportunities for its graduates.

2. All advertising and promotional literature used should clearly indicate that education, and not employment, is being offered.

3. All advertising and promotional literature should include the correct name of the school. So-called "blind" advertisements are considered misleading and unethical.

B. Field Agents

1. An institution is responsible to its current and prospective students for the representations made by its field representatives (including agencies and other authorized persons or firms soliciting students), and therefore should select each of them with the utmost care, provide them with adequate training, and arrange for proper supervision of their work.

2. It is the responsibility of an institution to conform to the laws and regulations of each of the states in which it operates or solicits students, and in particular to see that each of its field representatives working in any such state is properly licensed or registered as required by the laws of the state.

3. If field representatives are authorized to prepare and/or run advertising, or to use promotional materials, the institution should accept full responsibility for the materials used and should approve any such in advance of their use.

4. When field representatives are authorized to collect money from an applicant for enrollment, they should leave with the applicant a receipt for the money collected and a copy of the enrollment agreement.

5. No field representative should use any title, such as "counselor," "advisor," or "registrar" that tends to indicate that his/her duties and responsibilities are other than they actually are.

6. No field agent should violate orally any of the standards applicable to advertising and promotional material.

APPENDIX E

GUIDELINES OF INSTITUTIONAL GOOD PRACTICE

REFUND OF STUDENT CHARGES

Introduction from the Commission

The Policy Guidelines for Refund of Student Charges below can assist institutions in formulating fair and equitable policies and procedures for the refund of charges assessed to students. The Guidelines were formulated in 1979, and have been endorsed by many organizations in higher education, including the American Council on Education and the National Association of College and University Business Officers. The original publication of the Guidelines was made by the Office on Self-Regulation Initiatives of ACE, and they are reprinted with the permission of ACE. Some institutions are now proposing new forms of student charges and refunds (including full or partial refund of tuition to graduates who are unable to obtain employment), and a review of good practice in charging and refunding is timely.

While the guidelines are clear, it is useful to set down underlying principles on which they rest:

a. Complete and clear disclosure of charges and refunds. The Guidelines point to variations that can occur in student charges and in refund procedures: non-refundable charges; partially-refundable charges; optional charges; damage deposits; etc. Disclosure of student charges and refunds requires not only specifying amounts, but also stating clearly and unambiguously the circumstances resulting in a charge and the requirements for a refund. Complaints received about student charges and refunds have shown that students sometimes do not know conditions affecting a refund or, in some cases, all the charges that will be assessed. Each institution should examine its published schedule of charges and refunds to see that it is clear and complete. It is also helpful if all information about charges and refunds can be found in a single place, or at least in a single document, easily available to all students—especially prospective students, whose decisions on attending the institution may be substantially affected by the charge and refund policies. Many institutions have found that the annual catalog, which contains other information of value to present and prospective students, is a natural location for information on student charges and refunds. The Commission's General Institutional Requirement 5.a.ii. speaks to this matter of disclosure when it requires that a North Central institution "...publishes in its catalog or other appropriate places accurate inforamtion that fairly describes ... its charges and its refund policies."

b. Authoritative institutional mechanisms for establishing and administering student charges and refunds. Assessing charges against students and providing refunds when appropriate are institutional actions reflecting transactions between an individual student and the institution. Since these decisions speak in the name of the institution they should be made by an established institutional procedure, preferably action by the governing board. In some cases exceptions to a refund policy can properly take into account unusual circumstances affecting an individual student, but such decisions should be clear exceptions to an established policy; the refund policy should not be a collection of ad hoc judgments made by individuals.

c. Refunds should reflect the costs to the institution of providing the services a student has received. Institutions often must obligate themselves for carrying out operations on the basis of initial enrollments. When a student leaves in the course of the term there may be a little saving in expense to the institution; an overly generous refund to the leaving student can be an additional cost that must be borne by the students who stay. Because refund policies focus on individual students who leave an institution they have often provided refunds in excess of the saving in institutional expense. On the other hand, if a student's leaving does (or should) result in a lowered expense to the institution, that lowering of expense should be reflected in the refund for the leaving student. The Guidelines incorporate reasonable and fair principles reflecting the ways an educational institution incurs expenses in making its educational opportunities available to all students.

The Commission makes these Guidelines available to its affiliated institutions to encourage each to review its own student charge and refund policies.

POLICY GUIDELINES FOR REFUND OF STUDENT CHARGES

Guideline One. The governing board of the institution should review and approve the schedule of all institutional charges and refund policies applicable to students.

The pricing of services and refund policies have important consequences to students, parents, the institution, and society; as such, pricing and refund policies should receive board attention and approval.

Guideline Two. Institutions should seek consumer views in the process of establishing and amending charge and refund structures.

Decisions regarding institutional funds are ultimately the sole responsibility of the institution's legally designated fund custodians. However, consumer concerns do affect decision making, and involving consumers in decision making related to charges and refunds is a desirable approach for assessing student needs and creating public awareness of institutional requirements.

Guideline Three. Institutions should publish a current schedule of all student charges, a statement of the purpose for such charges, and related refund policies, and have them readily available free of charge to current and prospective students.

Students and parents have a right to know what charges they will be expected to pay and what will or will not be refunded. They also have a right to know what services accompany payment of the charges. Informational materials published free for students and prospective students are ideal for this purpose.

Guideline Four. Institutions should clearly designate all optional charges as "optional" in all published schedules and related materials. Clearly, charges that are mandatory and charges that are optional must be plainly differentiated in all printed materials.

Also, the institution should state clearly in its schedule if a charge is optional for some students but required for others. Statements accompanying the schedule may include institutional endorsements of the optional program or service.

Guideline Five. Institutions should clearly identify charges and deposits that are nonrefundable as "nonrefundable" on all published schedules.

Institutions determine on an individual basis which of their charges are refundable or nonrefundable. In general, admissions fees, application fees, laboratory fees, facility and student activity fees, and other similar charges are not refundable. Such fees are generally charged to cover the costs of activities such as processing applications and other student information, reserving academic positions, and establishing the limits of institutional programs and services, reserving housing space, and otherwise setting the fixed costs of the institution for the coming academic period.

Institutions determine on an individual basis which of their deposits are refundable or nonrefundable. Some deposits will be nonrefundable or will be credited to a student's account (e.g., tuition deposits). Others are refundable according to the terms of the deposit agreement (e.g., deposits for breakage).

Guideline Six. Institutions should refund housing rental charges, less a deposit, so long as written notification of cancellation is made prior to a well-publicized date that provides reasonable opportunity to make the space available to other students.

Written notification on or before the beginning of the term of the contract is necessary to ensure utilization of housing units. During the term of the contract, room charges are generally not refundable. However, based on the program offered, space availability, debt service requirements, state and local laws, and other individual circumstances, institutions may provide for some more flexible refund guideline for housing.

Guideline Seven. Institutions should refund board charges in full, less a deposit, if written notification of cancellation is made prior to a well-publicized date that falls on or before the beginning of the term of the contract. Subsequent board charges should be refunded on a pro rata basis less a withdrawal fee.

It is reasonable to make a refund for those goods and services not consumed. The withdrawal charge should reflect that portion of an institution's costs that are fixed for the term of the contract.

Guideline Eight. The institutional tuition refund policy for an academic period should include the following minimum guidelines:

1. The institution should refund 100 percent of the tuition charge, less a deposit fee, if written notification of cancellation is made prior to a well-publicized date that falls on or before the first day of classes.

2. The institution should refund at least 25 percent of the tuition charge if written notification is made during the first 25 percent of the academic period.

It is reasonable to refund tuition charges on a sliding scale if a student withdraws from his or her program prior to the end of the first 25 percent of the academic period, unless state law imposes a more restrictive refund policy.

Guideline Nine. The institution should assess no penalty charges where the institution, as opposed to the student, is in error. The institution should make refunds in cases where the institution has assessed charges in error.

Penalty charges, such as those involving late registration fees, change of scheduled fees, late payment fees, should not be assessed if it is determined that the student is not responsible for the action causing the charge to be levied.

Guideline Ten. Institutions should advise that any notification of withdrawal or cancellation and requests for refund must be in writing and addressed to the designated institutional officer.

A student's written notification of withdrawal or cancellation and request for a refund provides an accurate record of transactions and also ensures that such requests will be processed on a timely basis. Acceptance of oral requests is an undesirable practice.

Guideline Eleven. Institutions should pay or credit refunds due on a timely basis.

The definition of "timely basis" should include the time required to process a formal student request for refund, to process a check if required, and to allow for mail delivery, when necessary. If an institution has a policy that a refund of an inconsequential amount will not be made, such policy should be published as a part of all materials related to refund policies.

Guideline Twelve. Institutions should publicize, as a part of their dissemination of information on charges and refunds, that an appeals process exists for students or parents who feel that individual circumstances warrant exceptions from published policy. The informational materials should include the name, title, and address of the official responsible.

Although charges and refund policies should reflect extensive consideration of student and institutional needs, it will not be possible to encompass in these structures the variety of personal circumstances that may exist or develop. Institutions are required to provide a system of due process to their students, and charges and refund policies are legitimately a part of that process. Students and parents should be informed regularly of procedures for requesting information concerning exceptions to published policies.

APPENDIX F

GUIDELINES OF INSTITUTIONAL GOOD PRACTICE

DISCLOSURE, CONFIDENTIALITY AND THE INTEGRITY OF THE ACCREDITING PROCESS

Introduction from the Commission

Accreditation has two principal purposes: to provide a public confirmation that what the institution is doing is of acceptable quality and to assist each institution in improving its own activities.

These two purposes can sometimes conflict. Every institution, however excellent, can improve, and every evaluation will give rise to suggestions for improvement. Sometimes such suggestions are misinterpreted by the public as identifying areas of serious deficiency in an institution. In fact, they are simply advice, and having a reasonable privacy to consider advice can be helpful to constructive institutional change.

The accrediting process must demonstrate integrity if the public is to have confidence in its public certification of institutions and programs. Disclosure of information gained during an accrediting evaluation is necessary to provide public confidence. At the same time, confidentiality of information gained during an accrediting evaluation may be important to allow the institution reasonable freedom to act on useful suggestions in its own fashion.

The Council on Postsecondary Accreditation (COPA), which has among its members all of the regional postsecondary accrediting commissions, national institutional accrediting bodies, and specialized program accrediting bodies, has a particular obligation to develop guides for reasonable action by all accrediting bodies. COPA has recently completed a careful report of the relationship between disclosure and confidentiality of information and its bearing on the integrity of the accrediting process. The institutions affiliated with the North Central Association should find the report of significance and assistance in their relationships with all the accrediting bodies that serve them—not only North Central, but other accrediting bodies as well.

The policies and practices of North Central's Commission on Institutions of Higher Education conform to the guidelines of the COPA report. Our official list of accredited and candidate institutions appears annually in the North Central Association *Quarterly*. We publish in *Briefing* a report of the accrediting actions taken by the Commission shortly after each Commission meeting. Our *Handbook of Accreditation* gives details of our criteria and procedures. We provide for publication in the national *Accredited Institutions of Postsecondary Education* all the information listed in section II of the COPA report. Information about our institutions specified in section III is contained in each institution's Statement of Affiliation Status.

The Commission itself does not disclose the written Team Report submitted to each institution as a part of the evaluation process. Such reports are not formal statements of the Commission, but reflect the

opinions of the evaluation teams. The reports contain many suggestions made by the team for the institution's consideration—suggestions which in many cases have proved valuable to the institution in making constructive changes in its activities. The Team Report is not intended to stand alone, since it is written from the assumption that those who read it will have available the institution's own self-study document and other materials. Further, the consultative nature of the Team Report suggests that it may be most valuable as a private document. However, the Commission encourages each institution to use the report as it finds most helpful, including—if the institution desires it—making the report public.

We think the COPA report sets forth useful guidelines for all accrediting bodies, and we commend it to our North Central institutions. The necessary balance between disclosure and confidentiality in accreditation has moved steadily away from an excessive confidentiality—almost a secrecy—that characterized accreditation in earlier days. That movement is likely to continue in the future. The COPA report summarizes our present view of good practice. The comments and suggestions of persons in accredited institutions are solicited to help the Commission in making desired changes in our policies and procedures, recognizing that we desire both that disclosure needed for the public good and that confidentiality needed to enhance the value of accreditation for institutional improvement.

DISCLOSURE, CONFIDENTIALITY AND THE INTEGRITY OF THE ACCREDITING PROCESS

The process of accreditation has a two-fold purpose—the assessment and the enhancement of the educational quality of an institution or program. The process requires an honest, rigorous self-analysis, an on-site evaluation by a team of peers or a validated equivalent of an on-site review, a team report, a subsequent review by an accrediting body, and final action defining the accredited status of the institution or program thus evaluated. Concern for the integrity and effectiveness of the investigative and deliberative process involves respect for confidentiality of information required and evaluated. The purposes are endangered and the process is weakened when disclosure of aspects of the process inhibits both the institution's or program's ability to provide complete information and assess itself candidly and the accrediting body's ability to render sound judgments.

The relationship between the accrediting body and the institution or program is private and voluntary. Accrediting decisions are, however, used as a consideration in many formal actions by different publics—government funding agencies, scholarship commissions, foundations, employers, counselors, and potential students. Accrediting bodies have thus come to be viewed as quasi-public entities operating "for the common good" or "in the public interest," with certain responsibilities to the many groups which interact with the educational community. Thus the legitimate needs of accrediting bodies or those of their members for maintaining and preserving the integrity of the process must be reconciled with broader societal needs requiring disclosure of basic and essential information.

Relevant Considerations

Any attempt to reconcile the conflicting pressures for disclosure and for confidentiality involves consideration of several dimensions which serve to define the options available. First and foremost is the recognition that, since the public interest lies in the assurance that the institution or program is in fact achieving appropriate educational objectives and meeting established standards, the purpose of quality-assessment establishes the specific context within which aspects of the process are to be considered confidential or disclosable.

Within the context other factors must be considered by accrediting bodies as they develop clear and coherent policies on release of information. The timing of disclosure may in some instances be critical to preserve the integrity of the process and to provide correct information. The extent of disclosure may also be critical. Not all information gathered requires full disclosure, and such disclosure may neither serve the public interest nor help the institution. The substantive relevance of information to the purpose of quality-assessment should also be a significant consideration. Further, since information may be provided for varied purposes in different ways, the means of dissemination may be a significant factor in providing the clearest context of understanding of the information.

Accrediting bodies also have a responsibility to understand the legal responsibilities that are imposed as a consequence of being considered quasi-public entities. COPA policy statements, guidelines, and Provisions for recognition (Part B in particular) acknowledge these obligations.[1]

Principles Relevant to Disclosure

In addressing the specific issues relevant to disclosure of information on aspects of the accrediting process, the following principles, consistent with the COPA Provisions for recognition and the integrity of the accrediting process, are set forth:

1. Each accrediting body should have a clear statement of policy on what is to be reserved or kept confidential and what is to be disclosed with respect to documents generated in the accreditation process, information concerning decisions on accredited status, and information concerning the status of affiliation of the institution or program with the association.

2. Concern for maintaining and protecting the integrity and effectiveness of the accrediting process should play the major role in shaping accrediting body policies and procedures on disclosure of information.

3. Since quality-assessment defines the matrix within which items are to be considered disclosable or confidential, clear distinctions must be drawn between those substantively related to the determination of accredited status and those related to institutional or program improvement, e.g., between recommendations for action considered essential for maintenance of accredited status and advisory suggestions for the enhancement of the institution's or program's educational quality. The latter are not relevant for public disclosure.

4. Since the accreditation process involves the work of voluntary peer-evaluators, great care must be taken to ensure not only that the composition of visiting teams and review committees represents appropriate, relevant, and varied expertise, points of view and experience, but that evaluators are rigorously trained in good practices of securing and processing information essential for an objective and responsible review, and of reproducing this information in the reports or other communications developed.

5. In the development of policies and procedures for disclosure of information consistent with these principles and with COPA Provisions for recognition, accrediting bodies should take account of the following guidelines, organized according to five categories of disclosure:

Guidelines for Accrediting Bodies on Disclosure of Accrediting Information

The following guidelines have been developed by COPA to assist accrediting bodies in determining the extent of disclosure essential to meeting their responsibilities to the many persons and groups which

interact with the educational community, while maintaining the integrity and effectiveness of the self-regulatory process as a reliable authority in identifying quality in postsecondary education.

The relationship between the accrediting body and the institution or program is a contractual one, whether formal or informal. Legally the institution is the governing board or the corporate board of directors. When an institution is part of an educational system in which the institution's chief executive officer is in a line relationship to the chief executive officer of the system, this relationship should be taken into account in developing procedures for dissemination of information.

I. Information which must be published and disseminated.

A. Information concerning the accredited body.

The accrediting body must describe in official documents its scope, evaluative criteria, and procedures (Provision B.3.; C.4.), clearly delineating the process by which the accrediting decision is reached (Provision C.2.; C.4.) and the outcome of the process with respect to given institutions or programs (C.13.; C.14.).

B. Information relevant to decisions on pre-accreditation or accreditation status.

1. At least annually, in an official publication, a current listing of all institutions or programs with status in the accrediting body. (Provision B.4.)

2. At least annually, in an official publication,[2] all final decisions with respect to accredited status, affirmative and negative,[3] made during that year. (Provision B.4.) An institution or program which withdraws an application for status need not be identified. A decision to deny an initial application for status need not be published.

3. Any accrediting body procedures or policies for the release of additional information relevant to such decisions. (Provision B.3.)

II. Information that should be published relevant to affiliation status. At least the following information should be published in an official publication concerning the status of affiliation of an institution or program with the accrediting body, unless the information is otherwise available. The information should be preceded by a statement of the accrediting body's scope of accreditation activities, and indications as to where additional information may be obtained.

A. The name and address of the institution.

B. Designation of the institution's character and form of governance—public or private, nonprofit or profit, and whether it is part of a system.

C. Names of the chief executive officer, and, in the case of specialized programs, the name of the program director.

D. Accredited status:

1. Date of initial accreditation.
2. Date of most recent final action following a comprehensive evaluation.

E. Indication of whether degree-granting programs are offered at multiple program sites.

F. Level of offering—non-degree, associate, baccalaureate, professional, master's, doctoral.[4] (Specialized accrediting bodies will designate the level of program(s) accredited.)

III. Information which is available upon request.

A. Information relevant to affiliation status.

At least the following information should be made available in response to inquiries from parties seeking information relevant to the status of a specific institution or program.[5]

1. Name and address of the institution.
2. Institution's character—public or private, nonprofit or for profit—with identification of proprietors of for profit institutions.
3. Accredited status.
4. Location(s) of offerings.[6]
5. Level of offerings.

B. Information concerning the accrediting body.

1. Surveys, reports, etc., of the accrediting body.
2. A yearly list of scheduled visits.
3. The academic and professional qualifications of the members of its policy and decision-making bodies and its administrative personnel.

IV. Information available only from the institution, or by the accrediting body with the consent of the institution.

This category includes information supplied by the institution or program and/or the accrediting body in the course of the accrediting process and not incorporated in other public documents, such as the self-study, team report, recommendations of the team or intermediate review committee, institutional/programmatic responses to recommendations, and correspondence between the accrediting body and the institution related to the accreditation process.

Accrediting bodies should encourage institutions or programs to make publicly available information about their accredited status, and to share visiting team reports and institutional program responses with appropriate state agencies authorized to evaluate and approve institutional academic programs and therefore having a legitimate claim to information beyond that available to the general public.

V. Information necessary to correct misrepresentation.

If an institution or program releases information that misrepresents or distorts any action by the accrediting body with respect to any aspect of the accreditation process, or the status of affiliation with the accrediting body, the chief executive officer of the institution and the program director, where applicable, will be notified and informed that corrective action must be taken. If the misrepresentation or distortion is not promptly corrected, then the accrediting body may, at its discretion, release a public statement in such a form and content as it deems necessary to provide the correct information.

VI. Information not available for dissemination under any circumstances.

Certain relationships yield information which legally cannot be disclosed without the consent of the person who provides it—for example, the relationship between physician and patient, between attorney and client, between clergy and penitent, etc. Should such information, or other information that is protected under law by a comparable privilege or safeguard, come into the hands of an accrediting body or evaluation team, its disclosure to persons other than the immediate recipients would of course be inappropriate and might even be legally actionable.

[1] An analysis of the judicial and legislative context relevant to the responsibilities of accrediting agencies is available from the COPA office. In addition, associations may find significant help in the COPA Occasional Paper by William K. Kaplin on Accreditation and the Public Interest.

[2] The publication need not necessarily be the same as the one listing current accredited status. It may appear in a newsletter, quarterly, or public portion of Commission/Board minutes.

[3] If an appeal of a negative decision is filed, the accrediting body may withhold the public announcement of the decision during such an appeal. (COPA policy statement. Accreditation and the Public Interest, p. 4.)

[4] The information may be provided by special designation, i.e., "a,b,p,m,d" or other pattern; a general statement concerning the college's offering of programs in arts, sciences, and/or professional curricula at a particular degree-level or of courses at this level not applicable to degrees offered; reference to the institutional catalog; or reference to the COPA office for specificity concerning specialized accreditation of programs.

[5] Each accrediting body should maintain a brief history of the accredited status of all institutions or programs. The accrediting body may refer the inquirer to the institution for additional information, or develop with the institution a joint statement that both may use.

[6] Expanded information may be provided on off-campus sites (in-state, out-of-state, out-of-region, military bases, etc.) and/or the inquirer may be directed to the institution for such detail.

Approved by the COPA Board
October 11, 1984

APPENDIX G

COPA AND THE REGIONAL ACCREDITING ASSOCIATIONS

THE COUNCIL ON POSTSECONDARY ACCREDITATION
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MIDDLE STATES ASSOCIATION

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NEW ENGLAND ASSOCIATION

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Commission on Institutions of Higher Education
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Commission on Vocational, Technical and Career Institutions
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NORTH CENTRAL ASSOCIATION

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Commission on Institutions of Higher Education
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Commission on Colleges
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Commission on Occupational Education Institutions
Kenneth W. Tidwell, Executive Director
1866 Southern Lane
Decatur GA 30333-4097
(404) 897-6163

WESTERN ASSOCIATION

California, Hawaii, Guam and other areas of the Pacific

Accrediting Commission for Community and Junior Colleges
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Aptos CA 95003
(408) 688-7575

Accrediting Commission for Senior Colleges and Universities
Kay J. Andersen, Executive Director
PO Box 9990, c/o Mills College
Oakland CA 94613
(415) 632-5000

INDEX OF COMMISSION POLICIES

The following is an index of Commission policies with references to where information related to each policy can be found in *A Handbook of Accreditation*, *A Guide to Self-Study for Commission Evaluation*, and *A Manual for the Evaluation Visit*. The index appears in all three publications and is designed as a cross-reference. H/ identifies the *Handbook*, M/ the *Manual*, and G/ the *Guide* followed by the appropriate page number(s). The number ( ) following each policy identifies its internal policy number.

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